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Recommendations For Improvement Of The Pine Hills School

**MILES CITY, MONTANA
December, 1978**

ASSESSMENT TEAM:

Robert D. Cain, Jr.
William Holden
Anthony P. Trivisono

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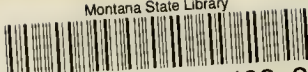
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RECOMMENDATIONS FOR IMPROVEMENT
OF THE
PINE HILLS SCHOOL

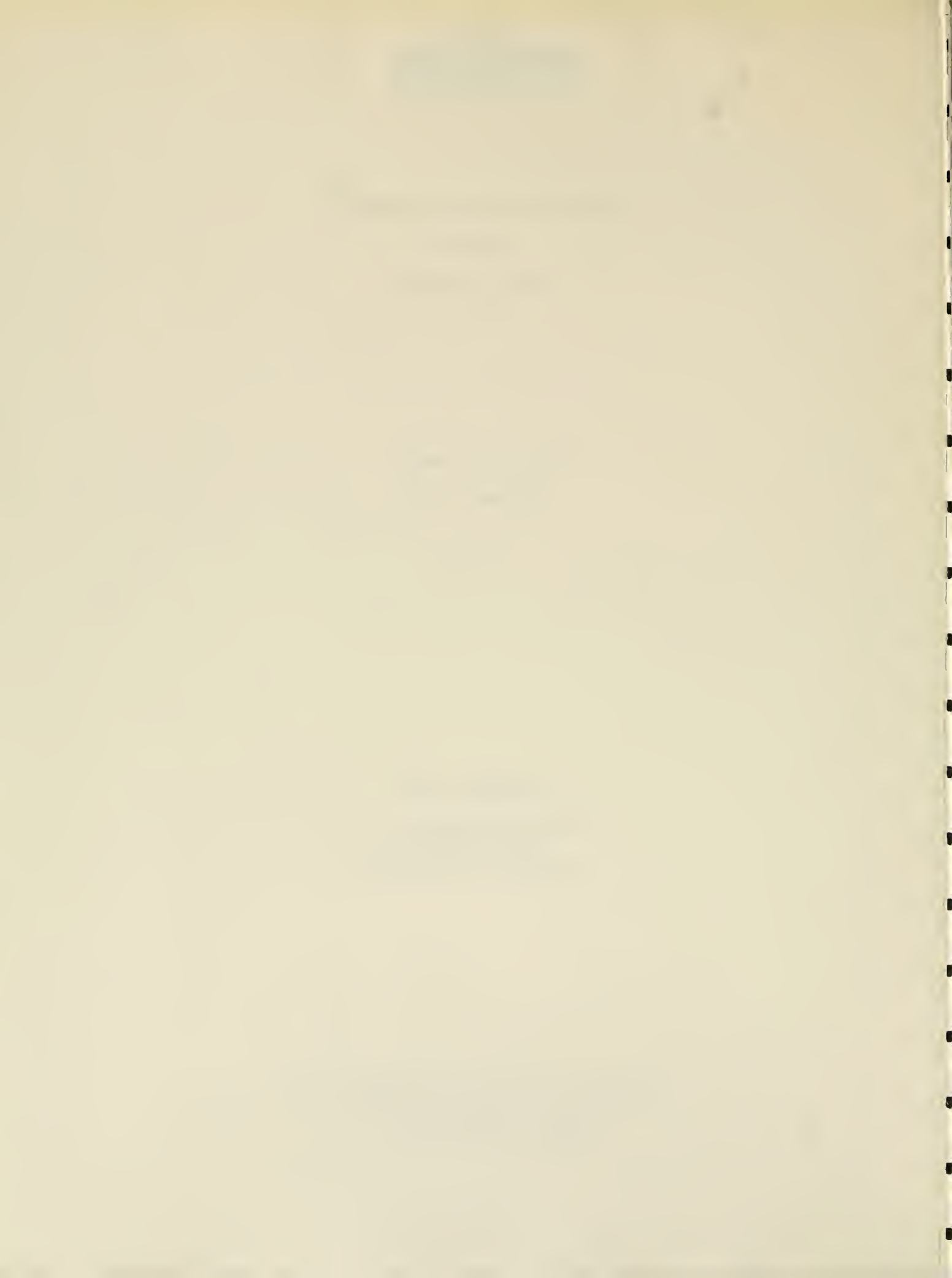
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ACKNOWLEDGEMENTS

The assessment team wishes to express appreciation to the Commission on Accreditation for Corrections for making its forthcoming Manual of Standards for Juvenile Correctional Institutions available in draft form to assist in this assessment of the Pine Hills School.

The assessment team also acknowledges the assistance of the many people who were interviewed during the assessment process. Some of the people interviewed clearly went out of their way to be accommodating to the assessment schedule. The assessment and this report could not have been completed without their assistance.



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I. INTRODUCTION

The purpose of this report is to present a set of carefully designed recommendations which will help to achieve two purposes:

- A. To assist the Montana Department of Institutions, Corrections Division, with the development of a Pine Hills School Component of a Master Plan for Corrections in Montana; and
- B. To provide the results of an assessment of the operation of the Pine Hills School conducted by a neutral third party which can serve as a basis for decisions and negotiations in the class action law suit, *D. Doe, et al., vs Don T. Holladay, et al.*

The Pine Hills School, formerly called the Montana State Industrial School, was established in March, 1893. Section 80-1410 R.C.M. 1947, as amended, defines that the purpose of the Pine Hills School is "to properly diagnose, care for, train, educate and rehabilitate children in need of these services." The Montana Governor's Annual Report for fiscal year, 1977, indicates "the primary responsibility of Pine Hills School is to meet the psychological, sociological, and educational needs of each student within the constraints of the law and according to legislative desires in order to return the boy to his community in the shortest period of time as a law abiding citizen."

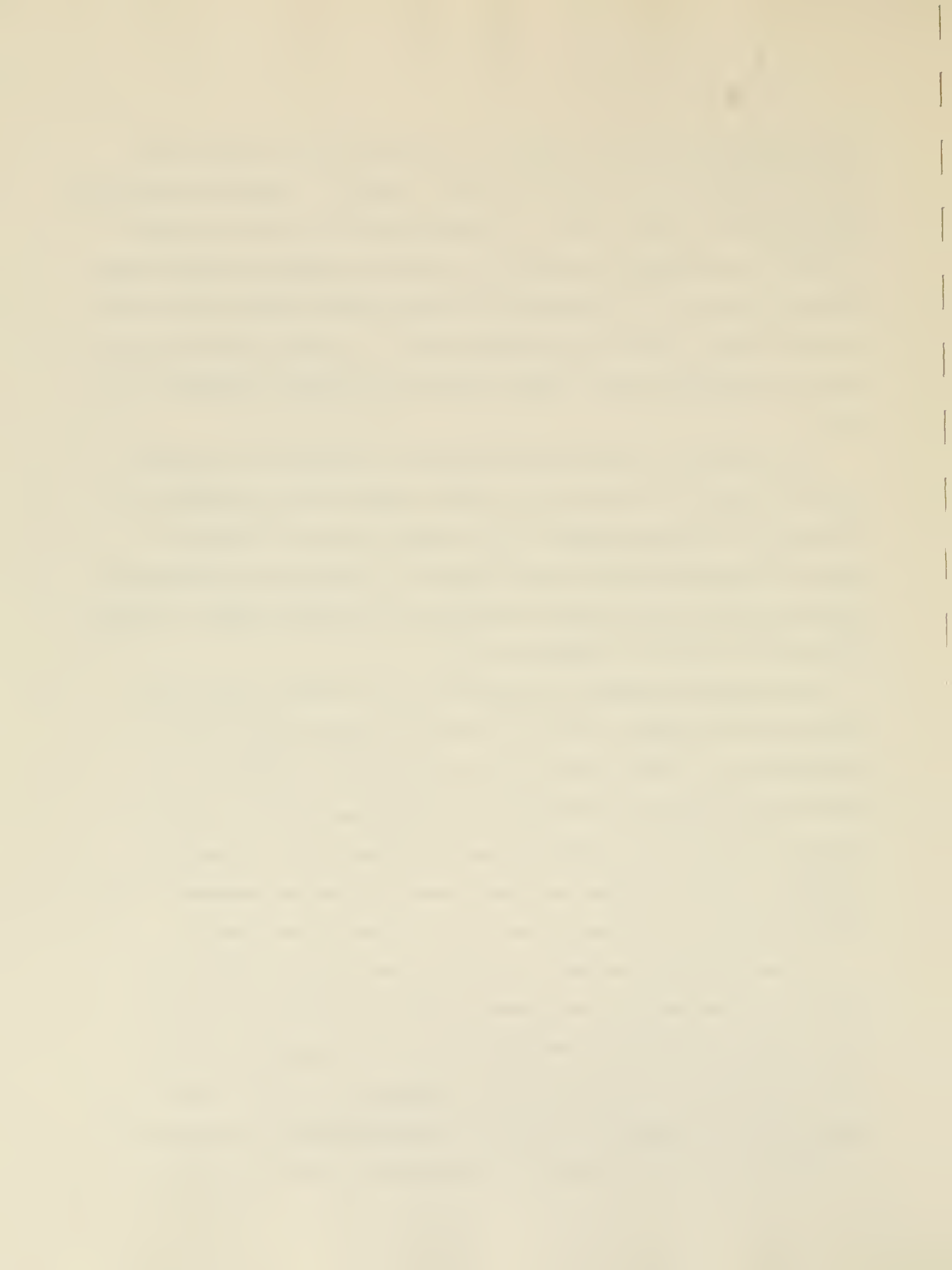
On May 24, 1977, a class action suit, *D. Doe, et al., vs Don T. Holladay, et al.*, was filed in the United States District Court for the District of Montana, Billings Division. On behalf of the plaintiffs confined in the Pine Hills School, Montana's correctional institution for male juveniles, this class action seeks to redress the alleged "deprivation under color of state law of rights, privileges and immunities secured to them and the class they represent by state law and the First, Third, Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution." This class action requests declaratory, injunctive and other equitable relief under the Civil Rights Act of 1871, 42 U.S.C., Section 1983.

This complaint is partially directed at the operation of the security unit, Lewis-Clark Lodge, at the Pine Hills School, alleging "...inhumane and deplorable conditions within the unit itself." Another part of the complaint alleges "... failure of the defendants to establish an effective, meaningful rehabilitation program at Pine Hills." The complaint also seeks relief from alleged practices of censoring mail, limiting correspondence and a "...failure to promulgate rules governing the administration, custody, transfer and release of students at Pine Hills."

On July 23, 1978, the Montana Department of Institutions, Corrections Division, on behalf of the Pine Hills School, entered into an agreement with Associates for Youth Development, Inc. of Tucson, Arizona, to conduct an empirical assessment of the Pine Hills School "in conjunction with the Master Plan for Corrections by the State of Montana and the pending federal litigation, *D. Doe, et al., vs Don T. Holladay, et al.*"

The requested assessment was conducted by a three member professional team consisting of Robert D. Cain, Jr., Director of Associates for Youth Development, Inc., Tucson, Arizona, William Holden, Superintendent of the Hennepin County Home School, Minnetonka, Minnesota, and Anthony P. Trivisono, Executive Director of the American Correctional Association, College Park, Maryland. All three of these individuals have had extensive experience in the field of juvenile corrections at the local, state and national levels.

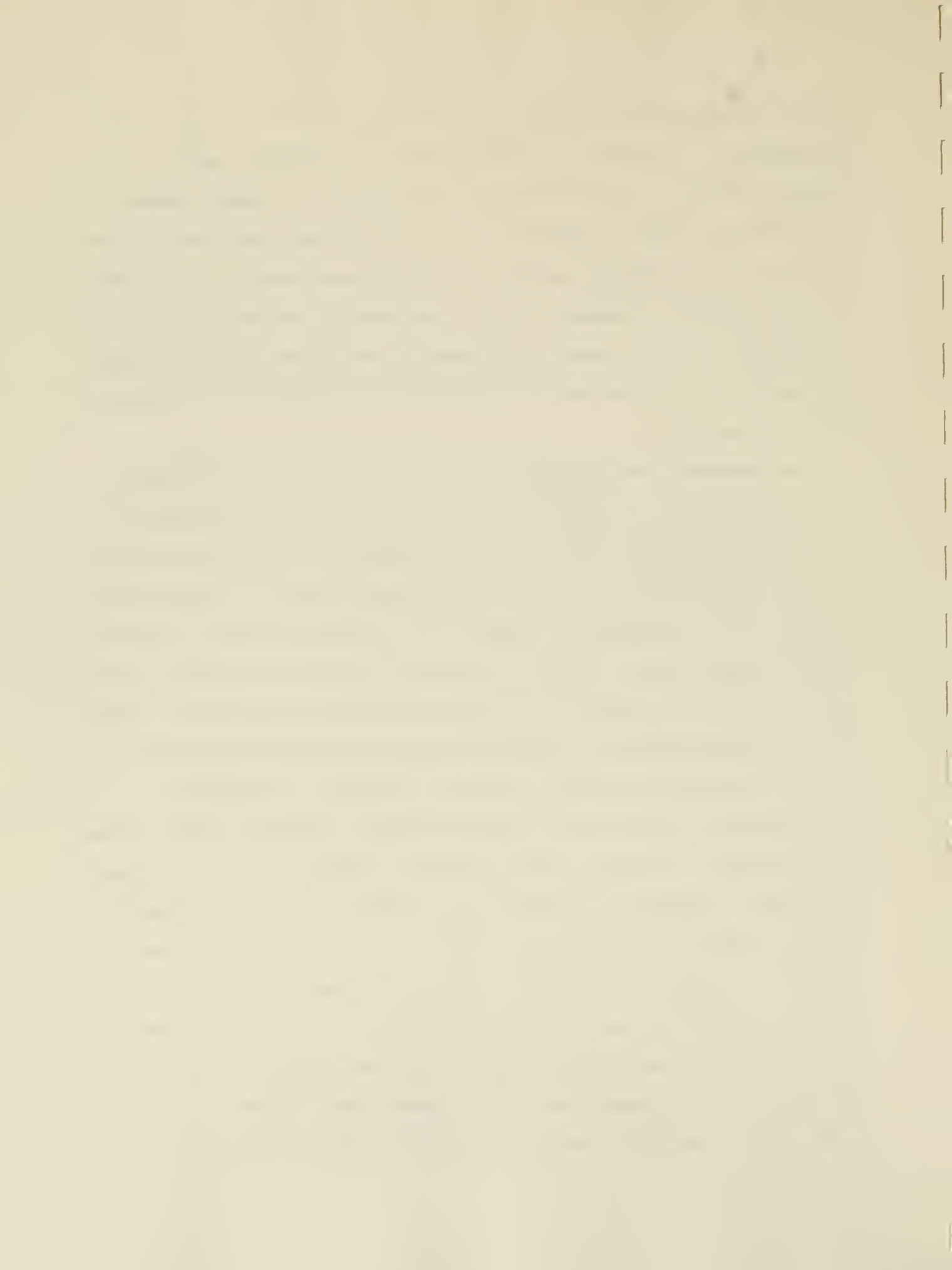
It was agreed that the major focus of the work of the assessment team would be in accordance with the "Agreement Regarding Evaluation of the Pine Hills School, CV-77-74-BLG," which was filed in the United States District Court regarding *D. Doe, et al., vs Don T. Holladay, et al.* This agreement required that the assessment and resulting recommendations be as comprehensive as permitted by available funding for the assessment, and focus in priority



order in the following six areas: A. Discipline and Control, B. Rules and Regulations, C. Treatment, D. Administration, E. Personnel, and F. Physical Facilities. The recommendations presented in this report address all six of these areas. Recommendations are also included regarding additional areas which were considered important by the assessment team to fully accomplish the purposes of this assessment. Each of the areas of concern covered by the recommendations in this report is addressed to the maximum extent the assessment team found it professionally responsible to do so within the limitations of funding available.

The assessment team made every effort to conduct a level of evaluation that would be a practical approach to appraising the need for improvement at the Pine Hills School, and would also be in keeping with the limited resources available for evaluation and the kinds of information that are available upon which evaluative judgments can be based. The assessment process also provided an opportunity for some of the key personnel at the Pine Hills School to receive limited technical assistance to facilitate some immediate improvements in the areas of institutional policy, program design and operational management.

It is important to recognize that many improvements have been made in the operation of the Pine Hills School during the five months that have elapsed since the formal assessment process was begun in late July, 1978. The assessment team is impressed with these efforts and with the obvious commitment of the Superintendent of the Pine Hills School and the Administrator of the Division of Corrections to continue to improve the institution and its component programs and services. For the purposes of this report, however, the changes which have occurred since the assessment process was begun are not reflected in the recommendations. The recommendations included in this report are based on observations made and information obtained during the site visits

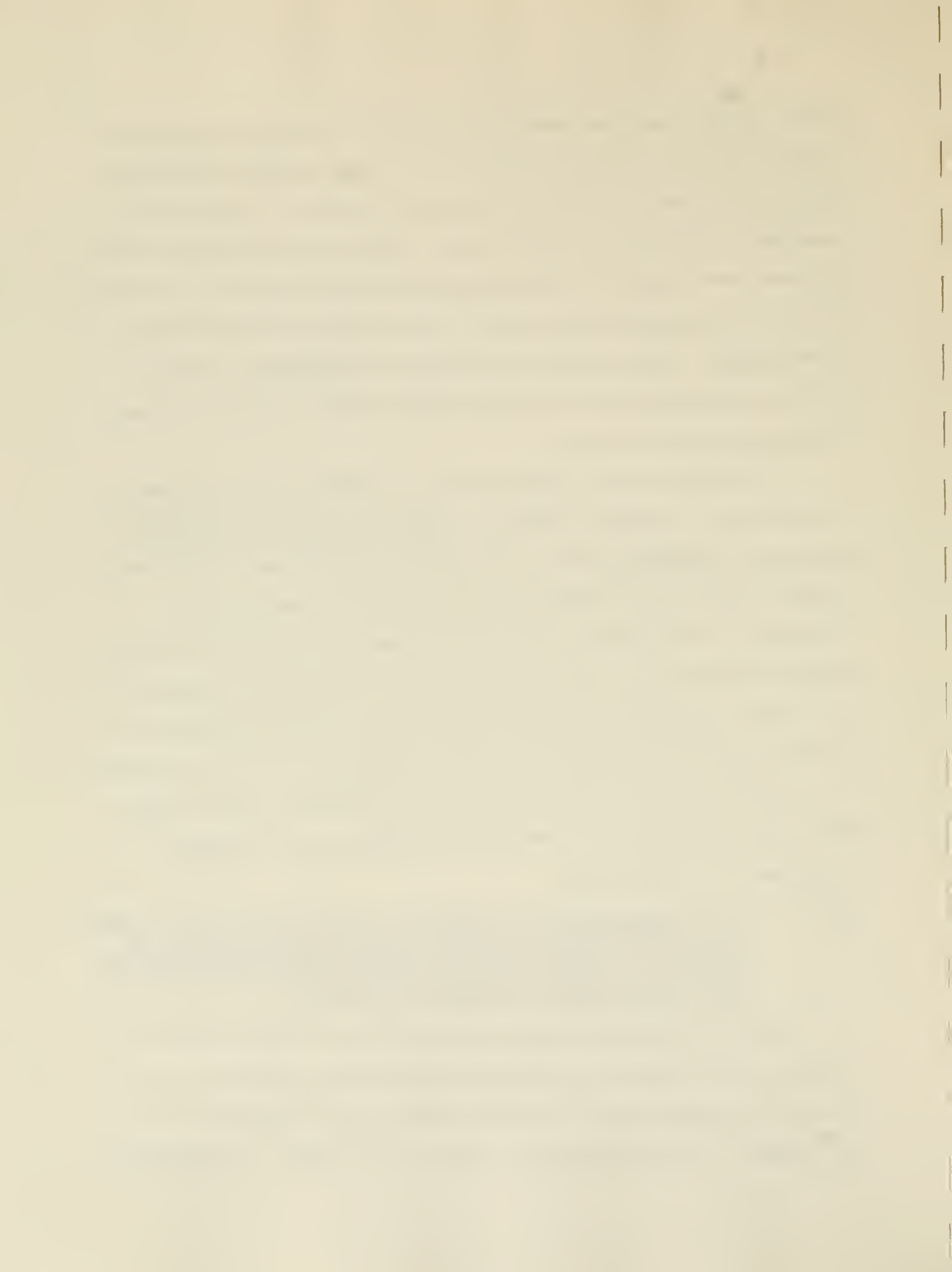


made by the assessment team members to the Pine Hills School and the Division of Corrections Administrative Office in July, August, September and October, 1978. Every attempt has been made to weigh the information received by the assessment team about the Pine Hills School carefully and to form conclusions only when there appears to be significant justification supporting a particular concern. The recommendations presented in this report are included because it was apparent to the assessment team that the recommendations could be justified and are supported by the observations made and conclusions formed during the assessment process.

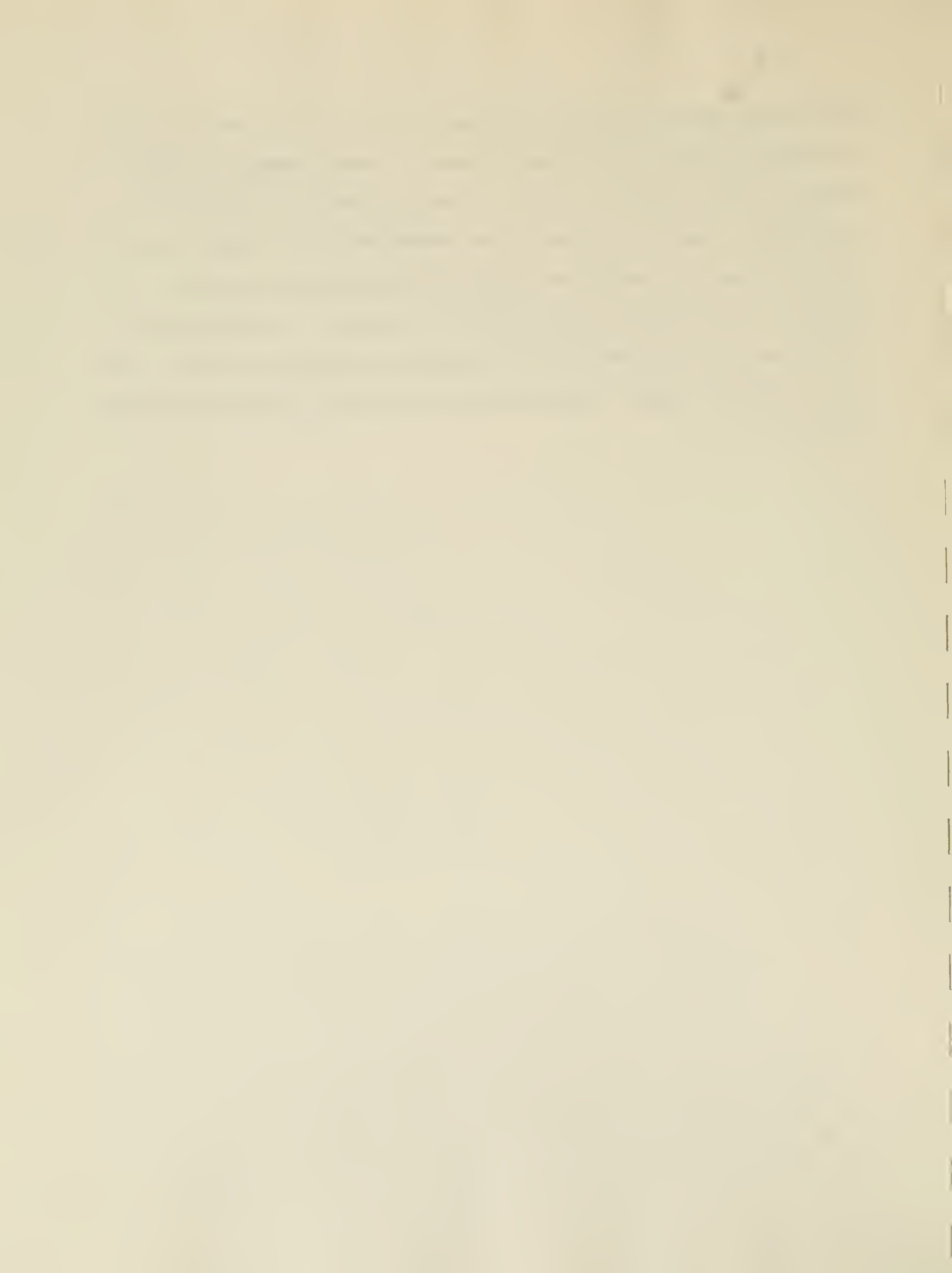
It is also important to recognize that the Commission on Accreditation for Corrections is currently developing a Manual of Standards for Juvenile Correctional Institutions, which will be published by February, 1979. The statement of principles adopted by the Commission on Accreditation for Corrections, in its effort to develop and implement an effective accreditation program within and for the field of corrections, is included as an appendix to this report. The standards being developed by this national Commission are significant for the entire field of juvenile corrections. It will be necessary for the Pine Hills School and the Division of Corrections to meet or exceed these forthcoming standards in order to be recognized as an accredited professional corrections agency.

- ✱ 1. It is recommended that the Division of Corrections/Pine Hills School obtain the new MANUAL OF STANDARDS FOR JUVENILE CORRECTIONAL INSTITUTIONS, to be published by the Commission on Accreditation for Corrections in February, 1979, and begin immediately to prepare for formal accreditation of the Pine Hills School.

Many of the standards required for accreditation cannot be implemented quickly, but will need to be considered and implemented through a carefully planned and managed process of organizational, policy, program and staff development. The recommendations included in this report are consistent with



the standards that must be met by the Pine Hills School for accreditation and, in addition to achieving the primary purposes of this assessment, have been designed with that objective in mind. If the Division of Corrections/Pine Hills School accepts and implements these recommendations in a timely fashion and also proceeds to substantively prepare for accreditation according to the additional standards being established by the Commission on Accreditation for Corrections, it is anticipated by the assessment team that the potential exists for the Pine Hills School to apply for and receive formal accreditation within four years.



II. TREATMENT PROGRAMS AND SERVICES

2. It is recommended that the programs, services and staff organization at the Pine Hills School be redesigned to establish and maintain a cottage centered treatment program.
3. It is recommended that Treatment Teams be formed to work with the students assigned to each cottage and that the composition of the Treatment Teams include, but not be limited to, staff representatives from academic and vocational education, social services and cottage life staff units who are working directly with the students who live in each cottage. Other staff, such as medical personnel, etc. should be included, as necessary, in the work of the Treatment Team in relation to each individual student. There should be a Treatment Team for each cottage. It is further recommended that written policy and procedure be established regarding the composition and authority of the teams. This policy should clearly state what decisions can and cannot be made by the cottage Treatment Teams, and what must be reviewed by the over-all Institutional Treatment Team (which is composed of the Superintendent, department directors, and other key staff as needed.)

The Treatment Teams are the major support systems for the cottage centered program efforts. Team meetings should be designed to provide scheduled opportunity for information-sharing, problem-solving and decision-making about the individualized program for each student. Team meetings can also be utilized as a time for discussing program issues and for making suggestions and recommendations for program change. The information generated by the work of the Treatment Teams and the progress of students in meeting their individualized program goals can also be very helpful to the institutional administration in conducting an on-going evaluation of the effectiveness of the total program. It is essential that social services, education and cottage life case records and information be made available to and utilized by each Treatment Team. Medical information should also be made available, as appropriate and required, for the work of each Treatment Team. Staff utilization should increasingly be around the cottage centered unit and less on a centralized level for maximum impact on the treatment program. Policies



which establish standards and govern treatment program efforts should be centralized; program activities should be decentralized by cottage units.

4. It is recommended that the following staff ratios be established as the minimum staffing standards for each cottage unit of 20 students at the Pine Hills School.

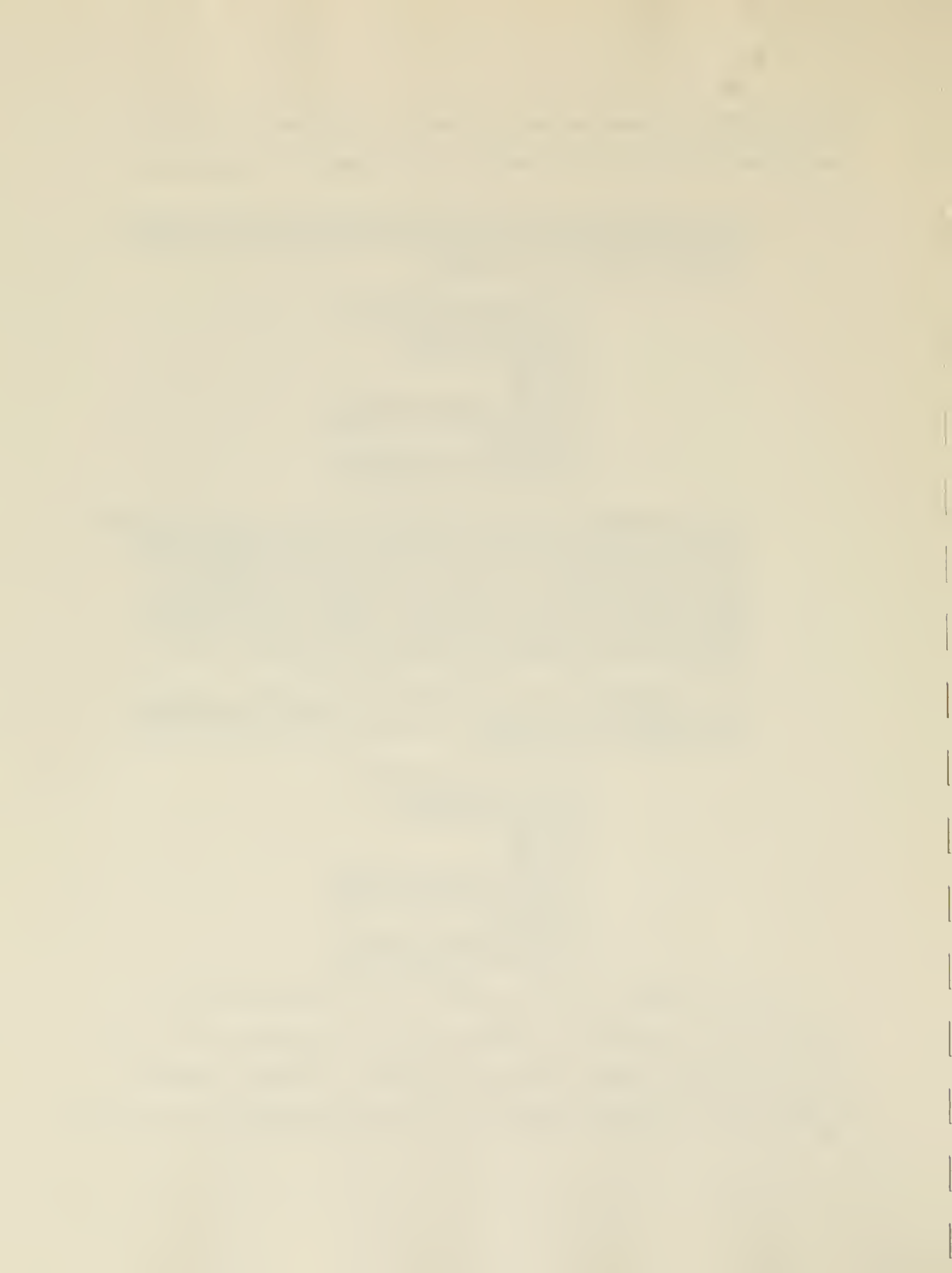
1 Full-time clerk typist
*2/3 Full-time nurse
1/2 Security position
2/3 Cook
1/4 Driver
*1 Social worker/counselor
1/4 Psychologist - PhD. level
*2 Teachers
*7 Cottage life attendants
*1 Cottage life supervisor

5. It is recommended that if the above asterisked(*) minimum staffing standards cannot be met for a maximum of twenty students placed in a cottage unit for a period of 4 weeks, no new students be placed in the cottage unit until these standards are met; if these standards cannot be met within 4 weeks, the population of the cottage be reduced to meet these standards; and, if these minimum standards are not met within 4 months, the cottage be closed until these staffing requirements are met.

6. It is recommended that the following staff ratios be established as the minimum staffing standards for the Internal Support Unit for a maximum of 10 students.

1 Full-time clerk typist
*2/3 Full-time nurse
1 Security position
2/3 Cook
1/4 Driver
*1 Social worker/counselor
1/4 Psychologist -PhD. level
*2 Teachers
*7 Cottage life attendants
*1 Cottage life supervisor

High risk students, who cannot control their assaultive behavior, who present danger to themselves or others, or who are a constant security risk, require specialized intensive care and programming. The above recommended minimum level of staffing is essential to establish and maintain the credibility



and quality of such an intensive treatment program effort. Unless the above asterisked (*) minimum staffing standards can be met within the same time frame as recommended for the regular cottage living units, then the same recommendations regarding reducing the population and/or closing the unit until these standards are met apply.

The above is recommended as the minimum level of staffing essential for the Pine Hills School to maintain and properly supervise the necessary 24 hour staff coverage of cottages and to maintain a credible, quality treatment program at the institution.

It is important to note that the recommended standard for security positions relates only to cottage post coverage security during non-academic school program hours and does not take into account other responsibilities.

7. It is recommended that the Superintendent of the Pine Hills School immediately conduct an assessment of the level and number of security staff positions required, to meet the above recommended staffing ratio and to also adequately provide for all of the other duties required of the security staff personnel, and request approval for the funds and positions necessary to maintain the proper level of security and control for the total institution.
8. It is recommended that written standing and post orders be established for each line cottage staff position, and that each individual employee read the appropriate post order prior to assuming his/her post and that he/she sign and date the post order.

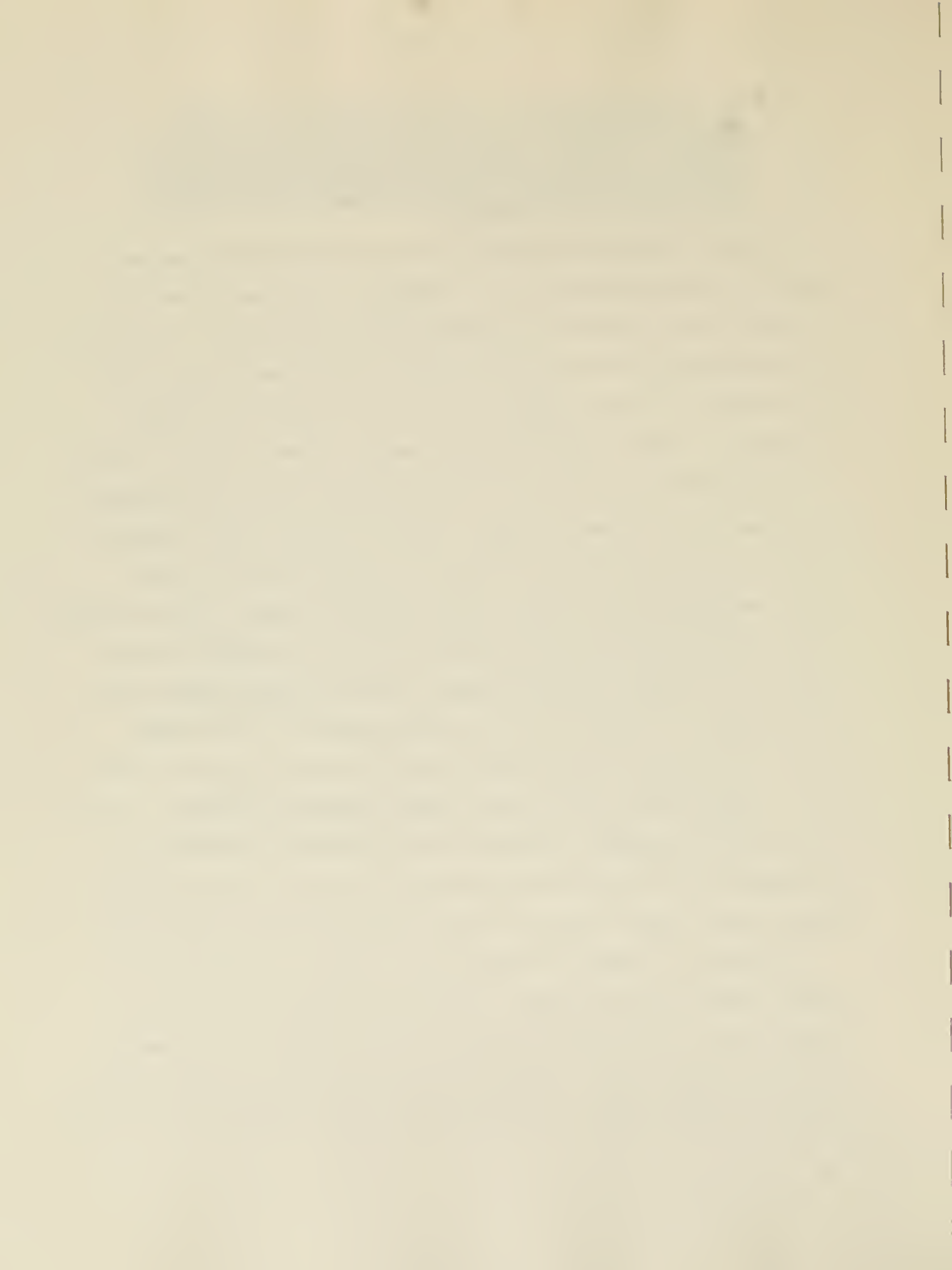
The written post orders for each position should specify what the job is and the procedures to be followed to carry out the assignment. All personnel should understand completely what is expected of them. This written post description and procedure provides for continuity in the event of personnel changes and ensures that all personnel assigned to a post, either permanently or temporarily, are familiar with the responsibilities of the post.

9. It is recommended that the job descriptions for all cottage life staff positions be upgraded to accurately reflect the treatment responsibilities and expectations of staff in these positions. These positions should be given priority in the classification and salary study recommended in the section of this report entitled "Personnel."

To properly develop and maintain a quality cottage centered treatment program at the Pine Hills School, as recommended, it is essential that care be taken to develop and maintain the best possible cottage staff. The cottage unit is the key area for the care and custody of students during their stay at the institution. The staff members who have direct contact with students in the cottage are some of the most important members of the institution's staff.

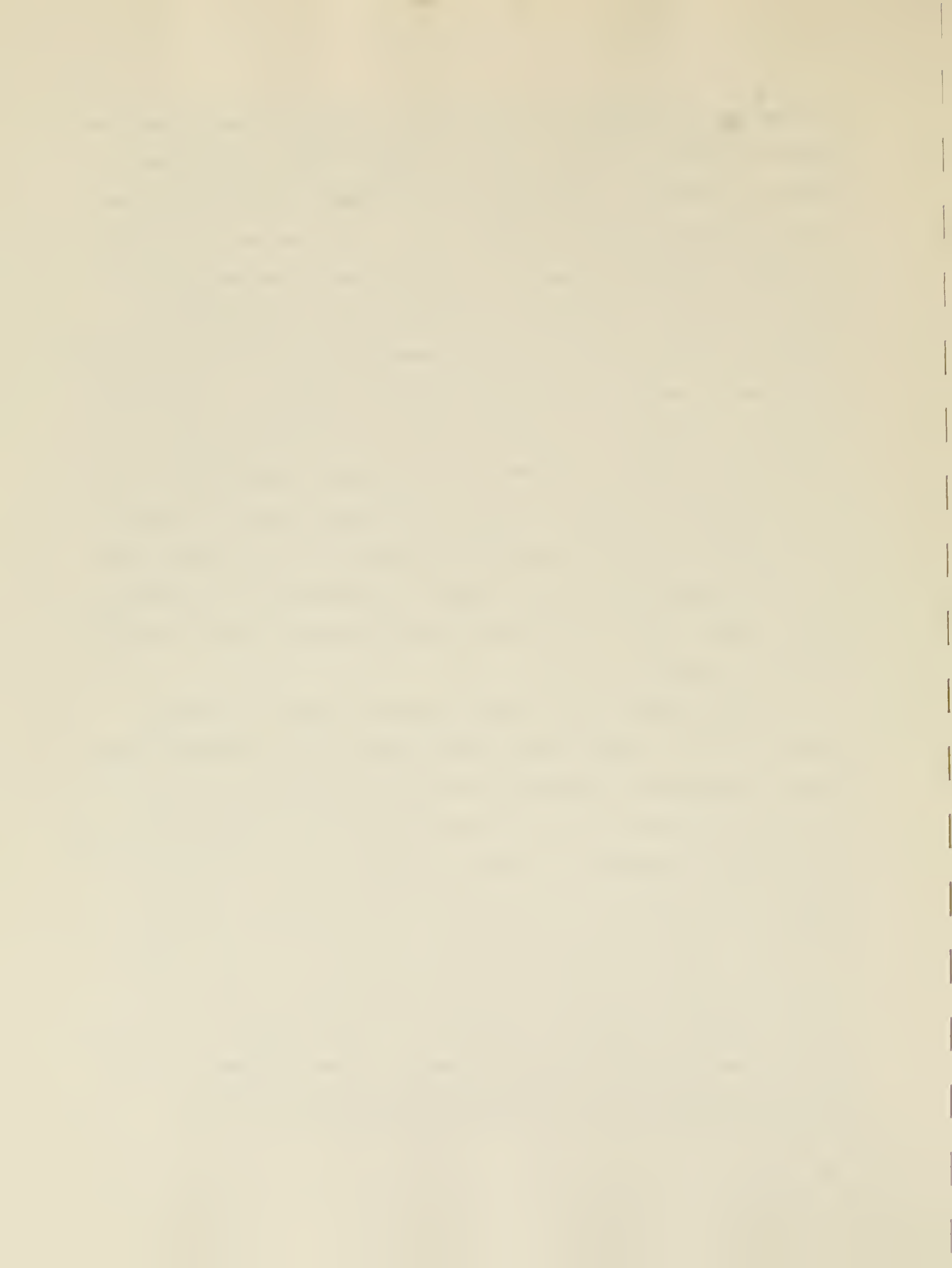
The personal qualifications of the cottage staff are extremely important. The cottage staff, both men and women, can help to change a youth's concept of adults by avoiding retaliatory conduct and evidencing genuine interest through understanding and respect for each individual student. They must possess a capacity to relate to youth and have the flexibility to adapt to each new situation. For example, they must be able to tolerate deviant behavior without condoning it or suppressing it in a punitive manner. Other personal qualifications should include emotional maturity, stability, ability to take hostility without reacting in a hostile manner, alertness, sensitivity to group situations, moral integrity, acceptable physical appearance, imagination and understanding of the institutional philosophy, the ability to make decisions based on facts, accept criticism, work under pressure and follow directions.

The quality of cottage life supervision is critical to the success of a cottage centered treatment program. The persons responsible for supervision of the cottage living program and the line cottage personnel are key members of the institutional staff. The quality of supervision of and support for the cottage life staff is basic to the morale of the entire institutional population.



The supervisor of cottage life staff must work closely with them and help them develop the capacity to make full use of treatment related knowledge and information in their work. He/she must also help them to recognize the nature of their relationship with the youth, as well as help them make constructive use of the relationships between the individual students and the group as a whole. The cottage life supervisor should be capable of recognizing the potential in staff working under his/her supervision, build on their strengths and aid them in working with all the institutional personnel. In performing these tasks, the cottage life supervisor must be a well-trained person. It is important to recognize that some of the best people in working with youth may not have the professional training and experience of others, but once in their positions, with proper supervision and support, they can adapt and work hard. These employees should be provided with extensive in-service training, which is helpful in their job related growth and development and in motivating them in their careers.

It is also important to be aware of potential problems with persons employed as staff. Persons whose own hostilities are easily stimulated cannot tolerate an expression of hostility on the part of institutionalized youth without some retaliation. Such staff members will utilize necessary restrictions as instruments of punishment. Likewise, persons who have a great need for affection and gratitude may ally themselves with the students, avoid the restrictions and be frustrated as they seek fulfillment of their own needs. Some persons cannot work helpfully with delinquent youth no matter how well they are guided and supported. Individuals who present problems of this nature should be removed from the staff and encouraged to seek employment in other areas more compatible with their personal characteristics and skills.

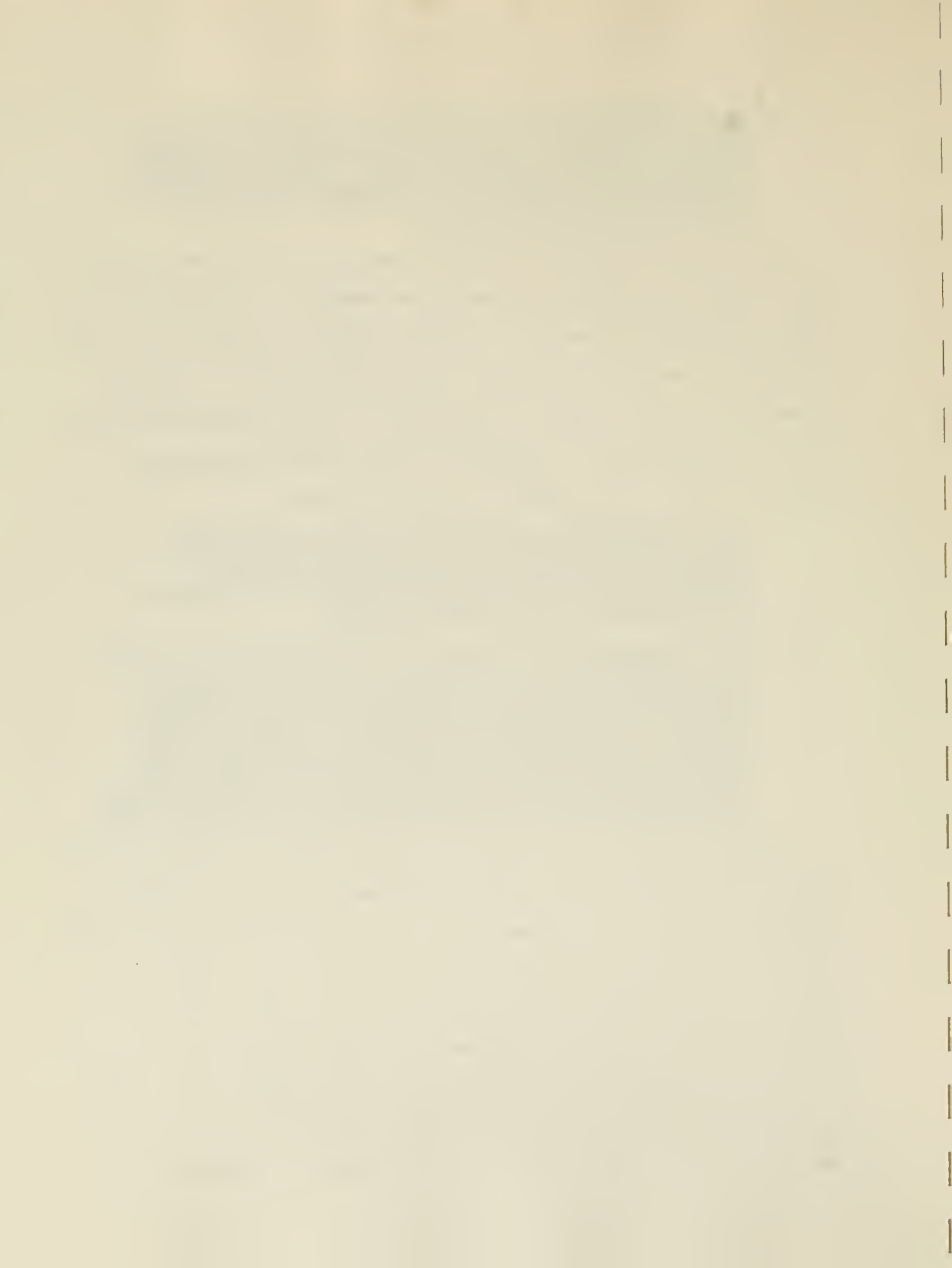


10. It is recommended that the minimum educational standards for entry level social worker/counselor positions at the Pine Hills School be upgraded to require 40 accredited hours in behavioral sciences, with no equivalencies allowed, and that this standard be applied when recruiting to fill social worker/counselor positions from this date forward.

This level of educational training is necessary for social services staff to have the basic conceptual understanding and vocabulary to utilize behavioral science literature and materials. This standard should be applied when recruiting to fill any new vacancy for social work/counselor positions. Successful implementation of this standard will probably also require upgrading the salary levels for these positions to be competitive with comparable occupational groups in the Miles City area and/or the State of Montana.

11. It is recommended that, consistent with the implementation of the cottage centered program and treatment team concepts, the social workers/counselors be reassigned to specific cottages and that their caseloads be composed of the students in the cottages to which they are assigned.
12. It is recommended that written policy and procedure be established to require and ensure that aftercare counselors visit the Pine Hills School once a month to personally contact the students at the institution who will be placed under their supervision upon release. This includes both new students and students who were previously released but whose aftercare status has been revoked. This policy should require and ensure that these monthly visits to the institution take place unless there is an exception granted by the Administrator of the Division of Corrections for just cause.

Aftercare visits to the institution should be scheduled through and coordinated by the appropriate social services supervisor and the social workers/counselors assigned to each cottage unit. It is essential that the work of the aftercare staff and the institutional social services staff be carefully integrated and coordinated in relation to each student. Aftercare counselors should also assist in the total treatment program through visits to the families of each student being considered for release for home visits. Aftercare counselors should also be involved through home visits and other pre-release preparations when students are being considered for release from the



institution for aftercare status. Field reports on the home and/or other community conditions which are important to the placement plans for each youth should be communicated verbally and in writing in sufficient time to be properly considered in the decisions to release students for community placement, whether the placement is a short-term trial visit or full aftercare status. Conversely, any time a student is on aftercare status and a recommendation for aftercare revocation is being considered the institutional social worker should be involved in the necessary discussions to help determine whether or not a return institutional placement is in the best interests of and can actually help the youth. If it is determined that institutional placement is not appropriate to the needs of the youth, then an alternative placement plan should be developed by the appropriate staff. It is essential that every possible effort be made to more fully integrate the work of the institutional and aftercare counselors, to ensure a smooth and successful transition of students from the institution back to the community.

13. It is recommended that the Pine Hills School obtain the position and funds necessary to establish a Treatment Team Leader position to supervise the intensive treatment program in the new Internal Support Unit to be constructed during 1979. It is further recommended that this position be filled with a professionally qualified clinical treatment employee at least three months before this new unit is opened, for purposes of program planning and implementation, including coordination of plans and procedures with other program units and staff training and development for the new unit.

The minimum qualifications for this position should be either eligibility for licensing as a clinical social worker or as a clinical psychologist (both of which require a two year masters level educational program and two years work experience beyond the masters degree in a clinical setting under qualified supervision) or a PhD level licensed clinical psychologist or a psychiatrist eligible for Board certification. To develop and maintain a high quality

intensive treatment program in this unit it is important that the above recommended minimum requirements be met with no equivalencies for education or experience allowed. The required work experience in a clinical setting should preferably be in the field of corrections. The person employed as the Treatment Team Leader for the Internal Support Unit could also serve as the Treatment Team Leader for one additional cottage unit.

It is suggested that the next logical step to improve the over-all treatment program at the Pine Hills School, beyond that which can be accomplished by implementing the recommendations in this report which call for upgrading of treatment staff qualifications and improving current program efforts, would be to establish and implement plans to employ one Treatment Team Leader for every two cottage units of 20 students. This is suggested as a long-range goal to continue improving the over-all clinical treatment program at the Pine Hills School during the 1980-1982 budget bienneum and beyond.

14. It is recommended that the practice of conducting 45 day diagnostic evaluations at the Pine Hills School be discontinued until and unless the institution is able to employ clinically trained professional staff qualified to properly assess and interpret the results of diagnostic testing.

The level of qualifications necessary to properly conduct this type of diagnostic work would require that the staff responsible for interpreting the testing be eligible for licensing as a PhD level clinical psychologist, licensing as a clinically trained Master of Social Work or a psychiatrist eligible for Board certification. Every effort should be made to recruit clinical staff of this caliber, even if it means upgrading the salary level of such positions to obtain qualified staff.

15. It is recommended that the Pine Hills School not be used to conduct a 45 day diagnostic evaluation of any youth who may be eligible for commitment to the Pine Hills School.

The purpose of the 45 day evaluation program should be clarified. If the primary purpose is to divert youth to other alternative placements, in lieu of institutional placement, then the diagnostic work should not be conducted at the institution. Such diagnostic work with this probable intent should be conducted by other public or private resources, whether conducted by another facility of the Department of Institutions, or by contract, or a purchase of service arrangement with other clinical resources.

16. It is recommended that a position be established and that every effort be made to recruit and employ a PhD level clinical psychologist to interpret the results of intake diagnostic testing at the Pine Hills School.

This recommendation applies to the regular intake diagnostic testing at the institution, whether or not the program of 45 day evaluation is continued.

17. It is recommended that, in addition to the current diagnostic testing, serious consideration also be given to giving the Jessness Inventory to all new students upon arrival and upon release, with the change on the "asocial index" computed, to determine whether students are becoming more delinquently oriented, staying the same, or becoming less delinquent, during their stay at the Pine Hills School.
18. It is further recommended that serious consideration be given to administering the Correctional Institutional Environment Scale every three months for one year to determine the kind of culture that exists in each unit at the institution, both among staff and students.

The Jessness Inventory provides information that is useful in monitoring. It can assist in determining the types of population at the institution by classification categories and can be a useful indicator about the type of training that should be provided to staff. Similarly, the Correctional Institutional Environment Scale results can indicate whether the culture of the students and/or staff is deteriorating or improving. If this scale is administered properly and periodically, it can be of real assistance in understanding what is actually happening in the institution. It is possible to determine from the results

what type of program orientation actually exists; for example, a therapeutic community oriented program, a relationship oriented program, an activity oriented program, or a custodial program. The use of these and other assessment and classification systems is suggested to encourage the Pine Hills School leadership to become up-to-date on this research and to experiment, on a carefully planned and well-managed basis, in developing a classification system which combines treatment methodology within the classification itself. Care must be taken to develop the clinical treatment staff leadership and ability to administer these instruments properly and to assess and use the results meaningfully. The objective should be to design and implement a treatment typology which gives a treatment prognosis which can be empirically validated. It is hoped that the Pine Hills School can begin to develop this capacity and adopt a useful system for the institution in approximately three years.

19. It is recommended that written policy and procedures be established to govern the reception, classification and orientation of all newly admitted students.

The daily program for students in the reception program should include interviews, testing and other activities related to the admission process, as well as counseling, education, work and recreation programs. New residents should be provided with reading materials, opportunities to attend religious services and recreational activities (both large muscle and sedentary) on the same schedule as the general population of the institution.

20. It is recommended that a packet of orientation materials be given to the parents and/or legal guardians of each new student placed at the Pine Hills School. This packet should include complete information about visitation, correspondence, use of telephones, programs and decision-making procedures within the institution which apply to their son. This orientation material should also include full information about the right of review by the court, when petitioned to do so by the parents, regarding decisions by the institution.

21. It is recommended that provisions be made for designing a personalized treatment program for and with each student which includes measurable criteria of expected behavior and accomplishments. The program plan should be written, including a projected time schedule for achievement and should be signed by both the student and appropriate staff. Also during the reception program, decisions should be made to classify the student in terms of custody required, housing assignment and participation in institutional and community programs.

Each newly admitted student should be evaluated in terms of personal, medical and social history. The diagnostic testing and assessment should produce information which is of value in preparing an individualized treatment plan for students to receive appropriate services, and to participate in appropriate programs that will assist them during their residence and subsequent release. The assessment process should also focus on the commitment offense. This is unique to the correctional process and is a tool to help determine and focus on other dynamics related to the commitment. The treatment program goals designed for each student must be reviewed on an on-going basis and revised when determined necessary by staff and/or student. The written policy and procedure should provide that the initial classification of students be completed within four weeks. Students should be removed from the reception unit/program as soon as possible and assigned to an individualized program most appropriate to their special needs and interests.

22. It is recommended that the treatment program and status review of each student occur at least every three months, or more often as required; that the criteria and procedures for changing status be in writing; that program and status adjustments be documented; and that there be due process safeguards when classification decisions involve an increase in the level of custody, transfer to another facility or other program that would adversely affect the student.

It is essential (1) that program and classification reviews be conducted by the Treatment Team and appropriate supervisory/administration personnel on a regular basis, (2) that the student's case records reflect any change or lack of

change in program, (3) that students be permitted to request reviews of their program and subsequent changes in the program, and, (4) treatment goals be mutually agreed to and signed by both student and the appropriate staff member. Treatment decisions should be made by the Treatment Team, but one staff member should be assigned to coordinate the entire program of each individual youth, and should be designated with the authority necessary to achieve this function. This person could be a social worker/counselor, teacher or cottage life staff member. Student-staff relationships, student needs, the student's program and the ability of staff to perform this responsibility should all be taken into account.

23. It is recommended that diagnostic testing, treatment programs and goals, and release criteria be related to the presenting problems of why the student is at the institution. It is also recommended that the individualized treatment program and goals and release criteria be clearly spelled out in writing before the student enters the program, and that when the student meets these conditions that he be considered for release.

Release standards should be based on meeting and dealing with the presenting problems and the student accepting responsibility for his actions which resulted in his being placed at the institution. If circumstances are discovered which are beyond the control of the institution and which are an obstacle to implementing the release plan, the problem should be clearly identified and immediate steps undertaken to seek assistance from persons and/or organizations that may be able to help resolve the situation as soon as possible. In the event that this effort is not successful within a reasonable period of time, an alternative placement plan should be established and implemented.

24. It is recommended that planning for release to community supervision for each student be initiated immediately after admission to the Pine Hills School, with the participation of the student, the student's family, and the appropriate institutional treatment and aftercare staff. This release preparation

program should provide for a graduated release through a systematic decrease in supervision and corresponding increase in student responsibility.

Direct and sudden release to the community without adequate preparation after a period of relative confinement, can have an adverse effect on the student's reintegration. Provision should be made for opportunities to participate in trips to surrounding areas, home visits, and other community activities in preparation for release to community supervision. For students needing transitional assistance, placement in a specialized community residential prerelease program or a community-based group home should be considered in the release planning if another suitable placement cannot be established.

25. It is recommended that written policy and procedure be established to provide for a major review of each student's progress and readiness for implementation of release to community supervision, no later than six months after admission to the Pine Hills School and every 90 days thereafter. This review should include an evaluation of the student's progress since admission and/or since the previous review and should result in a determination as to whether existing plans should be modified or continued. In addition to the institutional review process, it is recommended that, in the event any student remains at the Pine Hills School over 12 months, the case be reviewed by the appropriate court or the Department of Institutions at the end of 12 months to determine justification for continued jurisdiction.
26. It is recommended that written policy and procedure be established and strictly enforced by the Division of Corrections/Pine Hills School to govern all medical and health care services at the Pine Hills School.
27. It is recommended that a physician licensed in the State of Montana be responsible for the medical services at the Pine Hills School pursuant to a written agreement between the institution and the physician and/or a qualified medical authority and that the standard operating procedures which govern the provision of all medical care are approved and signed by the responsible physician.
28. It is recommended that treatment by medical personnel other than a physician be performed in accordance with written standing or direct orders. In lieu of standing orders, nationally certified physician assistants and nurse practitioners may practice within the limits of their national certification providing that such practice is consistent with state law and authorized by the responsible physician.

29. It is recommended that state licensure and/or certification requirements and restrictions apply to health care personnel and that verification of licensing and/or certification credentials be obtained and kept on file at the Pine Hills School.
30. It is recommended that all Pine Hills School personnel be trained in emergency care procedures and that written standard operating procedures and training of staff incorporate the following: Awareness of potential emergency situations; the ability to determine that an emergency is in progress; first-aid and resuscitation skills; knowing when and how to call for help; and procedures for transfer to appropriate medical care. It is also recommended that all staff have current training in basic first-aid equivalent to that defined by the American Red Cross.

It is essential that staff be made aware of the potential emergency situations that can occur in a correctional facility like the Pine Hills School, what they should do in facing life threatening conditions and what their responsibility is for the early detection of illness or injury.

31. It is recommended that at least one person per shift have training in receiving medical screening, basic life support, cardiopulmonary resuscitation (CPR), and the recognition of symptoms of the illnesses most common to the facility.

It is the responsibility of the physician to assure that the non-medical staff have an understanding of basic health care. It is the responsibility of the institution's administration to assure that trained staff are available on each shift.

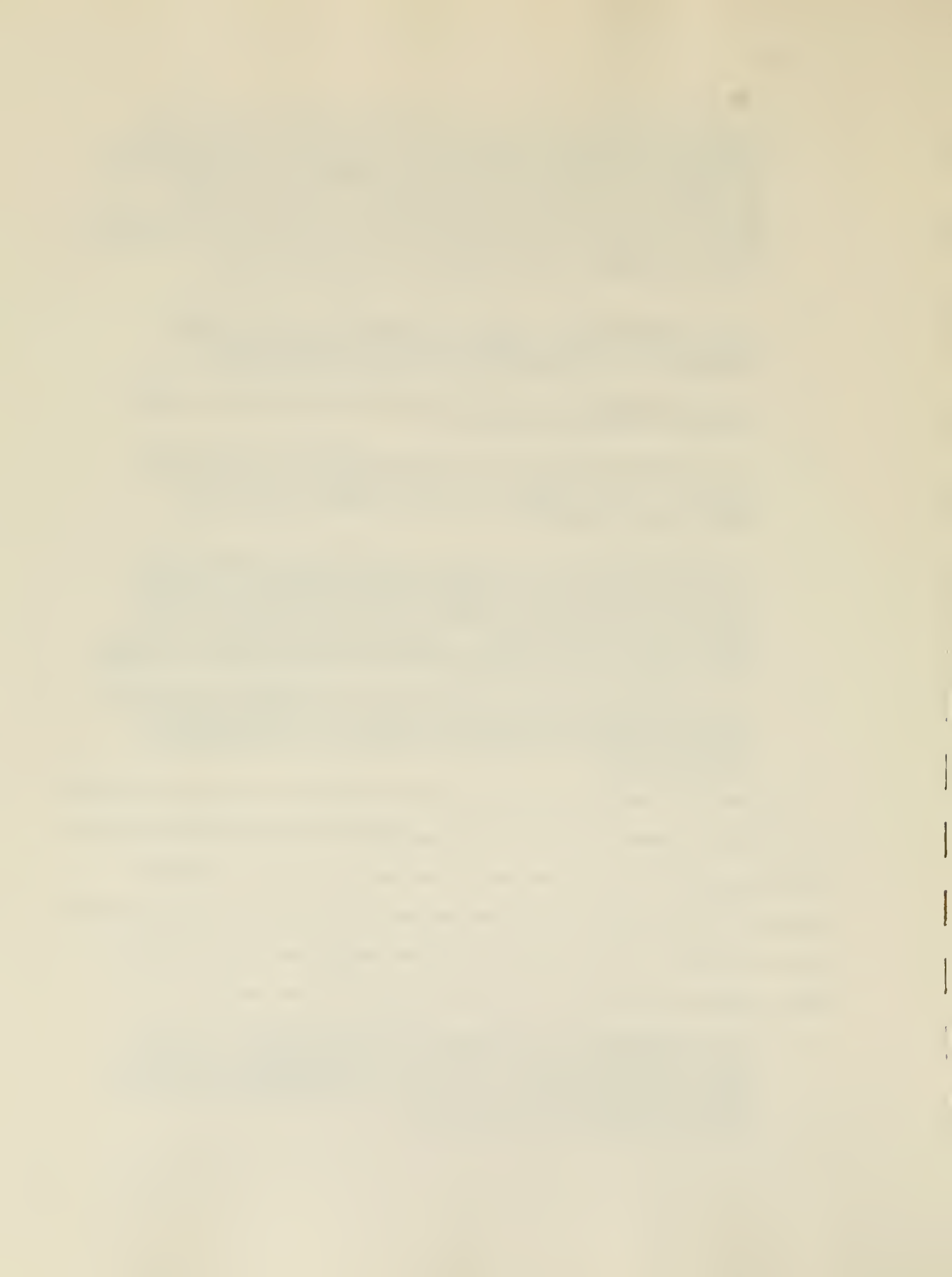
32. It is recommended that the written operating procedures for the proper management of pharmaceuticals include: a formulary; the requirement that the facility adhere to regulations established by the State Board of Pharmacy regarding medications; a policy regarding the prescription of all medications with particular attention to behavior modifying medications and those subject to abuse; the policies regarding medication dispensing and administration; and the policies regarding the maximum security storage and weekly inventory of all controlled substances, syringes, needles and surgical instruments.
33. It is recommended that stimulants, tranquilizing and psychotropic drugs, and drugs requiring intermuscular administration be prescribed only by a physician, following a physical examination of the student by the physician, and be administered by the physician

or registered nurse. It is also recommended that the Pine Hills School have a procedure, established as policy by the Division of Corrections and strictly enforced, for recording all administrations of stimulants, tranquilizing and psychotropic drugs including: type and quantity, the date and time, physician's reasons for the prescription, physician's observations of the immediate and continuing effects of the drug, written observations of the effects of the drug by other personnel, and the name of the student patient.

34. It is recommended that, under no circumstances, shall a stimulant, tranquilizing or psychotropic drug be administered for purposes of program management and control or discipline.
35. It is recommended that no student be left in the Pine Hills School infirmary unsupervised at any time.
36. It is recommended that one of the three nurses on the Pine Hills School staff be designated as a Supervisory Nurse and that her supervisory role, responsibilities and authority be clearly established in writing.
37. It is recommended that full medical evaluations be conducted by a licensed physician on all newly admitted students at the Pine Hills School to ensure the standardization and quality of medical information required for a proper evaluation of the health and medical needs of the students. This is in addition to the routine medical screening which may be conducted by allied medical personnel.
38. It is recommended that all Pine Hills School students be provided with basic dental screening, examination, care and treatment, including the provision of dental prosthetics, if prescribed by a licensed dentist.

The quality of medical services and record keeping at the Pine Hills School is of the utmost importance. It is also suggested that the Division of Corrections/Department of Institutions seek formal assistance from the Montana Department of Public Health to oversee the quality of medical services provided at the institution. It is preferable that the medical services and medical record keeping at the Pine Hills School be subject to peer medical review.

39. It is recommended that all academic teachers at the Pines Hills School be trained and certified in special education. In cases where current personnel do not meet this qualification, provision should be made to give each person the opportunity to obtain the required training for certification.



40. It is recommended that policy and procedures be established to enable students, who complete their high school requirements while at the Pine Hills School, to receive a high school diploma from a high school in their home school district (preferably where they attended school before being placed at the institution). If for any reason this is not possible, it is recommended that arrangements be made for such students to receive a high school diploma from the Montana State Department of Public Instruction. It is further recommended that, as soon as these arrangements have been completed, the practice of issuing diplomas with the name "Pine Hills School " on them be discontinued.

The practice of issuing diplomas from the Pine Hills School is obviously well intended to assure that diplomas are awarded to students who earn them. It is a practice, however, that has the potential of creating a negative labeling experience for any youth who receives one and should be discontinued as soon as other arrangements are made to ensure that diplomas will be issued by another appropriate public education authority.

41. It is recommended that the budget for educational program supplies at the Pine Hills School be increased as necessary to make it equivalent to the level of funding for educational program supplies in the local public school district serving the Miles City area.
42. It is recommended that the academic school records on each student be made available to the Treatment Team and that the Treatment Team records also be made available to appropriate educational program personnel, to assist in the design and coordination of the required treatment plan for each student.

Coordinating the program activities, services and records of each functional unit of the institution is important in the planning and implementation of individualized treatment plans. The absence of this type of cooperation within an institution creates problems which can negatively affect the appropriateness and/or quality of the treatment programs.

43. It is recommended that the vocational education program at the Pine Hills School be expanded to a full-time accredited program and that both vocational and educational testing and counseling be provided so that students are placed in the educational and/or vocational programs most suited to their individual needs and abilities.

44. It is recommended that a Vocational Trades Advisory Council be established, by written policy and procedure, to assist in development of the over-all vocational education program, to review and approve the teaching syllabus for each course, to establish standards and to assist in relating the program to relevant job opportunities in various communities throughout the State of Montana.

It is essential that the vocational training programs and related academic programs be relevant to the needs of the students and to actual employment opportunities in the communities to which the students will return when they leave the institution. The recommended Vocational Trades Advisory Council should be composed of interested people who have expertise in operating industries that are parallel to the programs and courses being conducted at the institution. It is suggested that, initially, the Council be composed of 7 people, possibly being sub-divided into areas of specialization and/or expanded in the future as necessary. The Council should meet 2-4 times per year, for two days each time, at the institution. The necessary professional staff and secretarial support should be provided by the institution. Such a Council, if properly developed and utilized, could act in an advisory capacity, not only to the Pine Hills School, but also to students, taking them on trips to offices, factories, and other job markets that utilize the skills being taught in the vocational education programs at the institution. The vocational training facilities and equipment at the Pine Hills School are excellent and could be more fully utilized, as recommended above, for the benefit of students who are most suited for such training. The Vocational Trades Advisory Council should also be used to help conduct an annual evaluation of the vocational education programs in accordance with stated performance objectives.

45. It is recommended that the Pine Hills School farm be converted into an accredited agricultural vocational education program.

The recommended Vocational Trades Advisory Council should review and approve the teaching syllabus for the agricultural program, as is recommended for all vocational education programs. The Vocational Trades Advisory Council should be consulted regarding any plans to lease and/or otherwise use the farm property to make certain that any change contemplated in the use of the property is consistent with long-range program goals.

46. It is recommended that the practice of requiring new students to attend 4 chapel services as part of the orientation program be immediately discontinued. It is further recommended that written policy and procedure provide for residents to participate, on a voluntary basis, in religious programs consistent with their religious beliefs.

It is the responsibility of the institution to ensure that all students are able to exercise their constitutional right to practice their religious beliefs. Because it is not feasible to provide full-time chaplains of all the denominations represented in the student population, the Pine Hills School Chaplain should coordinate the institutional religious services and community resources to meet the religious needs of the students.

47. It is recommended that, in addition to the library maintained in the academic school building at the Pine Hills School, a wide-range of reading material suitable for educational and leisure-time recreational purposes be available in each cottage unit.
48. It is recommended that written policy and procedure be established to ensure the right of students not to participate in coerced work assignments unless the work is reasonably related to their normal housekeeping and yard keeping tasks or personal hygienic needs or the work is part of an approved vocationally oriented program. This policy should state that no work may be performed by students that will personally benefit any staff member. (This recommendation is exclusive of recommendation #60).

Students should be expected to perform work that is reasonably related to necessary housekeeping and yard keeping tasks and work that is directly related to approved vocational training. Students should never be expected to do

maintenance or other work assignments as substitutes for regular staff. It is essential to recognize that juveniles under correctional supervision have not been convicted of a crime, and the thirteenth amendment to the United States Constitution prohibits involuntary servitude except "as punishment for crime." Work that benefits the community or the institution may also serve the needs of the students. It may be part of a vocational training program, or offer the opportunity to practice existing new skills, or simply be a relief from boredom. Where a dispute arises as to whether the work performed is a learning or rehabilitative experience or work performed benefits the institution only, an appropriate grievance procedure should be available to resolve such a dispute. If work is not related to a student's educational and/or treatment program and the work benefits the institution, the student should be paid. Work that is of public service nature in the community need not be compensated, but it should be voluntary.

49. It is recommended that written policy and procedure be established to provide for a comprehensive recreational program, decentralized by cottages, that includes at least 2 hours of large muscle recreational activity on school days and 3 hours per day on non-school days (weekends and holidays), and also includes cultural activities.

The recreational program should encompass both indoor and outdoor activities, including the use of recreational resources in the Miles City community. Transportation to appropriate community recreation and leisure time activities should be available and provision for periodic group activities outside the institution should be made. Indoor space for leisure time activities such as television, table games, reading, studying and cultural activities should be provided in each living unit. All recreational program efforts should be designed to help students channel their energies into socially acceptable and personally satisfying activities.

50. It is recommended that the Pine Hills School employ a full-time, qualified, recreation director to design and supervise the over-all recreational program activity.
51. It is recommended that the Pine Hills School establish the necessary position and employ a qualified recreational therapist to function within the cottage centered program to work with specialized problems, in support of the treatment program.
52. It is recommended that written policy provide for involvement of Pine Hills School students and staff in community activities in the Miles City area.

This is in addition to periodic involvement by students in activities in their home communities while on temporary pre-release visits or holiday visits. Activities should be planned and promoted for participation by the students in community programs and services to allow for normal exposure to and experience in social living. Involvement in civic, artistic, cultural, recreational and social activities to the degree that such opportunities exist in the local area should be encouraged. This community program activity should include social contacts with peers of both sexes. Use should also be made of community resources in terms of shopping services and social assistance. The business community should be informed of the program and its economic impact on the area. Community groups, both peers and adults of both sexes, should be invited to visit the Pine Hills School for special and other appropriate social, cultural, educational and recreational events on a periodic basis.

53. It is recommended that the Pine Hills School request the position and funds necessary to establish and fill the position of Director or Supervisor of Volunteer Services and that the person employed in this position be responsible for developing and supervising programs to provide for and secure volunteer citizen involvement in appropriate roles in the programs of the Pine Hills School.

III. STUDENT RULES, DISCIPLINE AND GRIEVANCE PROCEDURES

54. It is recommended that written rules of student conduct at the Pine Hills School be established which clearly specify prohibited behavior and penalties that may be imposed for various degrees of rule violations, and that procedures be maintained to ensure that all students and staff receive and understand these rules.

These rules should prohibit only behavior that can be shown clearly to have a direct, adverse effect on a student, or group of students, or a direct adverse effect on the safety or security of the institution. The range of sanctions that may be imposed for the various degrees of violations should be proportionate to the importance of the rule and the severity of the violation. Written procedures should specify how these regulations are issued and presented to new residents and staff as well as how revisions to the rules are distributed to all residents and staff. Special effort should be made to assure that new students receive and understand the rules within 24 hours of their arrival. These rules of conduct should be worded positively and if, in any instance, a literacy problem prevents a student from understanding the rules, special assistance should be provided by staff to help the student understand them. All staff who work with students in any way should receive orientation and continuous inservice training to become and remain thoroughly familiar with the rules of student conduct, the sanctions available and the rationale for the rules. The clarity and specificity of the rules and procedures should preclude any discrepancies among staff in interpretation. These written rules and procedures should also specify behavior that may be handled informally and should state guidelines for resolving minor misbehavior. The procedures for resolving minor violations by students should provide that offenders be informed of the specific charges of misconduct and be given an opportunity to explain or deny them. Students are to be notified if a report

of violation is placed in their file and may request a review of the appropriateness of the action, and in cases where students are found not guilty, all reference to the incident should be removed from their files. Minor infractions are generally considered to be those which may be resolved informally or which result in loss of entertainment or privileges for not more than 24 hours.

55. It is recommended that written policy and procedures require staff to prepare a disciplinary report when they have a reasonable belief that a resident has committed a reportable minor or major violation of the rules. This policy should state specifically what violations should be written up, the required information to be included in the report, by when the report must be prepared, by whom, and that the report must be dated and signed by the person who prepares it.

The established procedures should provide for timely distribution of the report to designated supervisory and security personnel. Investigations of alleged rule violations should be undertaken as soon as possible, no later than 24 hours, except where there are extraordinary circumstances, after the incident is reported. The investigating officer should be a supervisory staff member and should not be the employee who reported the incident.

56. It is recommended that, to ensure due process, a student charged with a violation of facility rules be given a written copy of the alleged rule violation(s) within 24 hours of the incident.
57. It is recommended that written policy and procedures specify that students charged with rule violations receive a hearing as soon as practicable under the circumstances of the case, but definitely within 72 hours for minor violations, and within 7 days for major violations, excluding weekends and holidays, and that if guilt is not established all reference to the incident be removed from the student's file.
58. It is recommended that written policy and procedure be established to ensure that, where a student has committed a major rule violation and segregation or confinement in an isolation room is necessary for the safety of the student or other students or for the security of the institution, the student be returned to the general population as soon as the emergency ceases and that all such actions are reviewed by the appropriate supervisor immediately upon the student's removal.

Whenever a student is removed from the general population for reasons of supervision, it is important that the student be visited by the assigned social worker/counselor as soon as possible. Every effort should be made to determine the cause(s) of the student's actions and assist the student to develop socially acceptable ways to deal with these causes.

59. It is recommended that written policy and procedure be established to ensure that if the disposition of a disciplinary infraction may include isolation in excess of 12 hours, the following minimal elements of review be required: (1) the student is informed of the reasons for the action being taken; (2) the student receives written notice of the charges prior to the hearing; (3) there are provisions for an impartial hearing to review the reasons for the restriction and make a decision on the facts presented; (4) the student is present and participates in the hearing, with an opportunity to make his own statement; (5) the student calls relevant witnesses; (6) the student is given assistance in presenting his position, if requested; (7) the decision is based solely on evidence; (8) a written statement is made of the findings, including the evidence relied on and the reasons for the decision; (9) an appeals process is available; (10) the student may appeal the decision; (11) the student is notified of the rights of the appeal; (12) the student is notified of the outcome of the appeal; and (13) the record is expunged if guilt is not established.

A major violation of the rules may entail loss of privileges or a period of separate confinement and requires independent review of the circumstances leading to such action. Specific and reasonable time limits should be established and stated in writing for each step in the process. The written policy and procedures should allow students, at their request, the services of a staff member to represent them at disciplinary hearings. If the student desires assistance in collecting and presenting evidence in his behalf, the Superintendent should appoint a staff member, chosen by and/or agreed to by the student, to provide representation. This representative should be permitted adequate time to speak with the youth and to interview appropriate witnesses. The student should receive a copy of the disciplinary decision and a copy should be filed in the student's record unless the expungement provision, as recommended

above, applies. Isolation or segregation in excess of 12 hours is a serious loss of privilege and due process principles should be applied.

Segregation and/or isolation should be used very sparingly. All violent persons are not well served by the use of such practices. It is important to distinguish between segregation and isolation. Dangerousness requires security, but not all dangerous students need to be locked up. Excessive use of lockup is not normal or accepted in correctional practice. Program decisions should always be appropriate to the specific needs of each student. Where dangerousness is a factor, both security and program efforts must be intensified in a manner specifically tailored to each student. When it is necessary to separate high risk students from the general population, it is essential that there be a comprehensive and intensive program including such elements as education, counseling, vocational programs with intensive supervision, etc. In effect, all the treatment programs and services available to the general population need to be provided also to those students who require separation from the general population, but in a more intensive and secure manner. It is also important that there be adequate development of a range of alternatives to locking students up and that such alternatives be made available for use by staff. These alternatives could include extra duty hours, special assignments, etc., with the provision that whatever logical consequences are applied are directly related to the offense and to the needs of the individual student. This is a basic operating principle. Staff training in this area is essential.

60. It is recommended that the written policy and procedures for student discipline include provision for a range of appropriate alternatives which may be employed as disciplinary measures, under strict supervision and control.

This policy should allow for, and establish criteria for, assigning of up to 2 hours of extra duty time and/or quiet time by staff by recording it in a

log which is reviewed by the supervisor. Additional time up to 12 hours should require review and approval of the supervisor and a written incident report. The procedures for handling any rule violation by students should provide that the students be informed of the specific charges of misconduct and be given an opportunity to explain or deny them. No extra duty or quiet time in excess of 12 hours should be permitted without a full due process procedure.

61. It is recommended that all policies regarding student rules, discipline and grievance procedures be distributed to all staff, discussed with each person, signed receipts for policies required and filed, and that each staff member be provided with an appropriate binder to maintain his/her personal copy of these policies and procedures in handbook form.
62. It is recommended that written policy and procedure be established to ensure that room restriction of any student not exceed 24 hours and be used only if the student is dangerous to himself or others, or if there is strong evidence that he is about to abscond, and that frequent contact be made with the student by staff (at least every half hour, or more frequent as appropriate regarding each individual youth) to ensure the well-being of the student.

All reasonable alternatives to room restriction should be considered before a decision is made to institute such restriction. Occasionally a student may lose control and need time to cool off. During this time there may be some restriction or suspension of privileges. In no instance should regular meals, reading and legal materials, clothing, sleep, health care and staff assistance be denied.

63. It is recommended that the Superintendent of the Pine Hills School delegate authority, in writing, to one or more subordinates to conduct disciplinary hearings for violation of institutional rules.

To ensure objectivity, disciplinary hearings should be conducted by a person or persons who were not directly involved in the incident, and, preferably, have no knowledge of the incident. The Division of Corrections should assign a hearing officer who is not an employee of the Pine Hills School to conduct these

hearings in any instance where there are charges against the Superintendent of the Pine Hills School.

64. It is recommended that the written policy and procedures grant students the right to appeal decisions of the disciplinary officer(s) to the Superintendent of the Pine Hills School or his designee within 10 days of the decision.
65. It is recommended that a written student grievance procedure be prepared and made available to all residents and staff of the Pine Hills School as an administrative mechanism for the expression and resolution of student problems. The grievance procedure should include: (1) provision for written responses to all grievances, including the reasons for the decision; (2) provision for response within a prescribed, reasonable time limit, with special provisions for responding to emergencies; (3) provision for advisory review of grievances; (4) provision for participation by staff and students in the design and operation of the grievance procedure; (5) provision for access by all students, with guarantees against reprisal; (6) applicability over a broad range of issues; and (7) means for resolving questions of jurisdiction.

The criteria for filing a grievance should be broad enough to encompass a grievance about the substance or application of any Pine Hills School Policy or any of its program units, or a complaint about any behavior or action directed toward a student by staff or other students. When there is a disagreement over whether a specific grievance falls within the grievance procedure's criteria, the issue of jurisdiction may be handled like any other grievance and resolved through the regular grievance procedure, with either party having full right of appeal.

66. It is recommended that the administrative process and grievance procedures allow appeal of all decisions to the Superintendent of the Pine Hills School, and that appeal of any and all decisions related to allegations of physical abuse of students by staff, or charges against the Superintendent, be allowed to the Administrator of the Division of Corrections and to the Director of the Department of Institutions.

67. It is recommended that the Director of the Department of Institutions appoint an individual, who is not an employee of the Division of Corrections, to serve as the Director's Representative and who shall represent the Director in investigating and resolving any condition or complaint which comes to his/her attention which endangers or appears to endanger the rights, health, safety or welfare of students placed in the legal custody of the Department.

The Director's Representative should be empowered with the full authority of the Director to investigate and resolve complaints regarding the rights, health, safety or welfare of students. This person should be responsible for following up on sealed complaints received from students and for ordering corrective action when he/she deems it advisable within current policy and procedure. If current policy is not adequate to resolve a specific concern, the Director's Representative should work directly with the Director of the Department of Institutions and the Administrator of the Division of Corrections to correct the policy deficiency. The Director's Representative should prepare an annual report which does not violate confidentiality, but does indicate the nature and types of complaints received and the nature and type of resolutions achieved. This annual report should be made available as a matter of public record.

IV. ADDITIONAL STUDENT RIGHTS, MAIL, VISITING AND USE OF TELEPHONE

68. It is recommended that written policy and procedure be established to ensure that authority over and control of students at the Pine Hills School is always exercised by staff and never delegated to students.

Juveniles do not have the maturity to supervise their peers. When this occurs, abuse is likely to follow. In recognition of this, staff should never, even for short periods of time, delegate supervision authority or responsibility to students. The assessment team agrees with the present plans of the Pine Hills School for having a Student Council. The Student Council approach is an excellent method of obtaining input of information from students about conditions at the institution that affect them. Such a group can also, on a cottage by cottage basis, serve as a sounding board to determine the likes and dislikes of students regarding menus, movies, library materials, recreational and other leisure time programs, etc. Participation in a Student Council can and should be an opportunity for meaningful participation of students with the institutional administration for input of information and discussion. The Student Council should never be given operational control or supervision over other students.

69. It is recommended that written policy and procedure be established which requires the Superintendent, department directors and the supervisor of each functional program unit at the Pine Hills School to visit the institution's living and program activity areas on at least a weekly basis.

Many students may be inhibited by a formal system of scheduling interviews with supervisory and administrative level staff. The procedure recommended above would make it possible for all students to have informal access to key staff. Also, all administrative and supervisory level personnel should have a first-hand working knowledge of the conditions in each of the living and

program areas of the institution on a continuous basis.

70. It is recommended that written policy and procedure be established by the Division of Corrections/Pine Hills School to ensure that students are not subjected to corporal or unusual punishment, humiliation, mental abuse, or punitive interference with the daily functions of living, such as eating or sleeping.

Any sanctions which may adversely affect a student's health, physical or psychological well-being should be expressly prohibited. The disciplinary measures to be applied to staff who violate this policy should be clearly defined and enforced. This policy should be distributed to and discussed with all staff and signed receipts for the policy placed in each employee personnel file. This should not be construed as detracting from the regular and routine enforcement of institutional rules or the application of appropriate forms of discipline.

71. It is recommended that written policy and procedure be established by the Division of Corrections/Pine Hills School to ensure the right of students to have access to the courts and to have access to attorneys and their authorized representatives.

It is essential that students have the right to challenge the legality of their commitment or placement, seek redress for illegal conditions or treatment while under correctional control, pursue remedies in connection with civil legal problems, and assert against correctional or other governmental authority any other rights protected by constitutional or statutory provision. This policy and procedure should also provide for institutional/Division authorities to assist students in making confidential contact with attorneys and their authorized representatives, who may include law students, special investigators, lay counsel or other persons who have a legitimate connection with the legal issue being pursued. Provision should be made for visits during normal facility hours, uncensored correspondence, telephone communication, and

after-hours visits when requested and required because of special circumstances.

72. It is recommended that written policy and procedure be established by the Division of Corrections/Pine Hills School to govern student correspondence. This policy should require that all correspondence be uncensored, and that both incoming and outgoing letters not be read by staff (except when and where there is clear and convincing evidence to justify such actions on the basis of threat to the safety and security of the institution, students or staff.) This policy should allow the inspection of incoming student mail to intercept cash, checks, money orders or contraband.

Students should be permitted to communicate with their families and friends, as well as with public officials, the courts and their attorneys. This is an integral part of rehabilitation. The number of correspondents for a resident should be unlimited, and there should be no limitation on the number of letters a student may send them. If, in any instance, it is determined that mail to a particular student must be read because of clear and convincing evidence that it poses a threat to the security of the institution, other students, or staff, it should be opened and read in the presence of the student. The reasons for the action should be documented and placed in the student's record. If contraband is discovered it should be removed and a receipt given to both the sender and the addressee and any appropriate follow-up initiated. Only illegal items and items that threaten the security of the institution should be considered contraband. Written procedures should also specify how contraband is to be handled. In addition to providing for notice of the seizure of contraband to both the sender and addressee the written policy and procedure should specify how seizures can be challenged. All cash, checks or money orders sent to students should be held for the student in accordance with written procedures approved by the Division of Corrections. The written policies governing student mail should be provided to each student and each correspondent, as well as all to all staff. This written policy and procedure should also make provision for indigent students to receive a postage allowance to send a reasonable minimum

number of letters per month. There should be no limit to the number of letters residents may send their lawyers, or to officials of the court, the Pine Hills School, the Division of Corrections and the Department of Institutions.

73. It is further recommended that the written policy and procedures governing student correspondence specify that students are permitted to send sealed letters to a specified class of persons and organizations, including, but not limited to courts, counsel, officials of the Pine Hills School, officials of the Division of Corrections, and officials of the Department of Institutions.

Mail from students to this specified class of persons and organizations should not be opened. Mail to students from this specified class of persons and organizations should be opened only to inspect for contraband and only in the presence of the student.

74. It is recommended that written policy and procedure be established by the Division of Corrections/Pine Hills School to ensure the right for students to receive visits, subject only to the limitations necessary to maintain the order and security of the institution. This policy should provide that the number of visitors a resident may receive and the length of visits may be limited only by the institution's schedule and space and personnel constraints, or where there are substantial reasons for the Superintendent to justify such limitations. This policy should also specify the conditions for extended visits between students and their families. This policy and procedure should be provided to all staff members (signed receipt required), students and visitors. This policy should be reviewed at least annually and updated as required.

Because strong family and community ties increase the likelihood that the student will succeed after release, visits to students should be encouraged. Provision should be made for visitation with persons of their choice, except when the Superintendent or his designee can present clear and convincing evidence that such visitation jeopardizes the safety and security of the students, the visitors or the institution. This policy should clearly specify the procedures for determining approval for extended visits of students with their families, including the length, place and other conditions for the visit. An

opportunity for the student to spend two or three consecutive days with family members can help to reestablish or strengthen family ties. This policy should also include provisions and procedures for special visits. Special visits may include visits to hospitalized students, visits to residents in disciplinary status and visits between students and their attorneys.

75. It is recommended that written policy and procedures be established by the Division of Corrections/Pine Hills School to provide students reasonable access to telephones to make and receive private calls. This policy should specify the hours of telephone availability, and any limitations on calls, such as the number and types of which will be paid for by the institution. This policy should also provide that students have daily access to place collect telephone calls and to receive calls from any person. Emergency calls, paid for by the institution, should be allowed in addition to any limitation on calls otherwise paid for by the institution.

Telephone calls, as visitation, is an important aspect of the student's maintaining important community ties with his family and friends and should be encouraged. Equitable access to telephones should be provided to all students. The Superintendent, for just cause and with appropriate written notice to all parties with provision for appeal of his decision, may restrict telephone privileges.

76. It is recommended that there be no standard hair length or style required of the students at the Pine Hills School, except in cases where restrictions are necessary for reasons of health and safety. Such exceptions should be specified by policy.

It is important that the personal appearance of students be neat and clean. It is essential that all necessary hair services be available to students. All rules relating to hair length or styles or facial hair should be based only on health and safety objectives.



V. SECURITY AND CONTROL

77. It is recommended that a new manual containing all of the procedures for institutional security and control and detailed instructions for implementing these procedures be developed.

Each staff member involved with security and control functions should be provided with a personal copy of this manual and a readily accessible copy should be kept in the security and control center of the institution. Copies of this manual should also be made available to all key supervisory personnel throughout the institution.

78. It is recommended that written standing and post orders be established for each security and control staff position, and that each individual employee read the appropriate post order prior to assuming his/her post and that he/she sign and date the post order.

The written post orders for each position should specify what the job is and the procedures to be followed to carry out the assignment. All personnel should understand completely what is expected of them. This written post description and procedure provides for continuity in the event of personnel changes and ensures that all personnel assigned to a post, either permanently or temporarily, are familiar with the responsibilities of the post.

79. It is recommended that written policy and procedures be established by the Division of Corrections/Pine Hills School restricting the use of physical force to instances of self-protection, protection of the individual student or others, prevention of major property damage and prevention of escapes. This policy should clearly indicate that only the minimum force necessary may be employed. This policy should also specify sanctions against staff for improper use of force and require signed receipts from staff indicating that they fully understand the policy.

This policy should be reviewed annually and updated as needed.

Personnel involved in the use of force should be prepared to justify their

actions in accordance with the written policy and procedures, and/or may be required to defend their actions in the event of a civil or criminal suit.

80. It is recommended that written policy and procedures be established by the Division of Corrections/Pine Hills School to govern the availability and use of mechanical, chemical, and/or soft restraints, with provisions for training, documentation of use, accountability and sanctions for improper use. This policy should clearly state that mechanical, chemical and/or soft restraints are never, under any circumstances, used as punishment, retaliation, or for disciplinary purposes. This policy should also require signed receipts from staff indicating that they fully understand it.

The use of mechanical restraints, such as handcuffs, and soft restraints, such as hand holds, waist-belts and other soft restraints as those that may be used under medical/psychiatric supervision should be limited to use by trained security personnel only, and used only for the purposes of restraining individuals from engaging in behavior that would endanger themselves or others, for preventing serious destruction of property and for transporting persons under security precautions. In each situation, care should be exercised to assure that no greater force is used than is reasonable and necessary to control the situation.

81. It is recommended that written policy and procedure be established by the Division of Corrections/Pine Hills School which requires that all instances involving the use of physical force or restraint be documented in writing. This policy should indicate what is to be included in the report, who must write it, by when, how and to whom the report is to be distributed and that the report must be dated and signed by the person who prepares it.

This policy should also specify who is to be notified when certain types of incidents occur and provide for supervisory review of all such incidents. In each instance the appropriate supervisor should present his/her assessment of the incident and the way it was handled to the Superintendent. All reports of incidents involving the use of force or restraints should be reviewed by the Superintendent for a determination as to whether further investigation and/or administrative follow-up are required.

82. It is recommended that a security master log be established and maintained at the security control center of the Pine Hills School and that this log be maintained on a 24 hour per day basis by the security staff on duty. This log should contain all incident reports and the current notes of the roving security staff. All current incident reports and related security reports should be numbered sequentially by year and the source of the report (each cottage, roving security, etc.)

This is a basic procedure for providing efficient communication of current information about what is going on throughout the institution, without having to make several telephone calls or depending on rumor. Security personnel, the Superintendent and other appropriate supervisory and administrative personnel can check this log when coming on duty to identify any items which may need follow-up.

83. It is recommended that any staff member on duty alone in a unit be provided with a portable communications system (such as a pocket signal generator, a two-way radio or similar device), which is not dependant on the telephone or the primary electric power system, that enables that staff member to have immediate contact or communication with the institution's security control center in the event that emergency assistance is needed.
84. It is recommended that written policy and procedure be established for evacuation plans in the event of a fire or major emergency. It is further recommended that these procedures include periodic fire drills so that both students and staff remain aware of emergency evacuation procedures and that the procedures for prompt release of students in locked areas in an emergency be clearly defined.

All Pine Hills School personnel should be thoroughly trained in emergency evacuation procedures. Their responsibilities should be clearly defined. They should know the location of keys and evacuation routes. The evacuation plan should also include provision for medical care and transportation for any injured persons. The plan should also specify subsequent housing plans for students from any living unit that may be rendered uninhabitable by fire or other disaster.

VI. ADMINISTRATION

85. It is recommended that the authority, responsibility, functions and accountability of the Superintendent of the Pine Hills School be clearly specified in writing and established as policy by the Administrator of the Division of Corrections.

Effective leadership cannot be properly established or maintained without a clearly stated and understood delineation of the authority, responsibilities and accountability of the administration. The basic functions which should be specified include planning, organizing, staffing, coordinating, directing and exercising control over all facility operations. This should be reviewed and updated as necessary on at least an annual basis.

86. It is recommended that the authority, responsibility functions and accountability of each department director and the head staff member of each functional subsection of each department of the Pine Hills School be specified in writing and established as policy by the administration of the Pine Hills School.

As above, this information should be reviewed on at least an annual basis and updated as necessary.

87. It is recommended that the Superintendent and Department Directors of the Pine Hills School work jointly to formulate, in writing, the mission, goals and objectives for the total facility and for each department and the functional sub-units of each department, establish policies and priorities related to them and translate the goals into measurable objectives and activities to be accomplished by the staff.

As envisioned by the assessment team, the mission is a general, but clear statement of the purpose of the Pine Hills School which is in keeping with the juvenile corrections philosophy of the Division of Corrections and should apply to each functional program unit of the institution. Goals are clear statements of the end results or conditions to be sought by the institution through its individual departments and program units. Objectives are descriptive of shorter range and more specific conditions to be accomplished in pursuit of the goals.

Activities are a set of specific steps (programs and services) capable of achieving the stated goals and objectives. Establishing a timetable with specific deadlines related to each activity, objective and goal is essential for measuring progress during the course of planning for, implementing and monitoring operation of the required programs and services. These operational plans should be reviewed on a continuous basis and updated at least annually, or more often as required.

88. It is recommended that a new operations manual be developed which includes all policies, procedures, rules and regulations applicable to the operation of the institution and its various programs and services, and that it be readily available to all staff.

This operations manual should provide detailed procedures and instructions for the day-to-day operations of the institution. This manual should be readily available to and used by all employees to ensure consistency in understanding and conducting operations throughout the institution. This manual should include a clear statement of purpose, table of contents and an open-ended numbering system to permit continuous updating of the manual as programs and procedures change. At a minimum, this entire manual should be reviewed at least annually and updated on a continuous basis, as needed.

89. It is recommended that when policies are established which apply to all staff of a given program unit that copies be provided to each staff member in that staff unit. It is further recommended that when policies are established which apply to all staff of the institution that copies be provided to each staff member throughout the institution.

It is essential that operational policies be well understood and in the personal possession of each staff member to be maintained as a handbook. It is not sufficient to only post such policies on bulletin boards, or to have only one copy available at each living unit or program section.

90. It is recommended that a procedure be immediately established which requires every employee to sign a receipt for each written

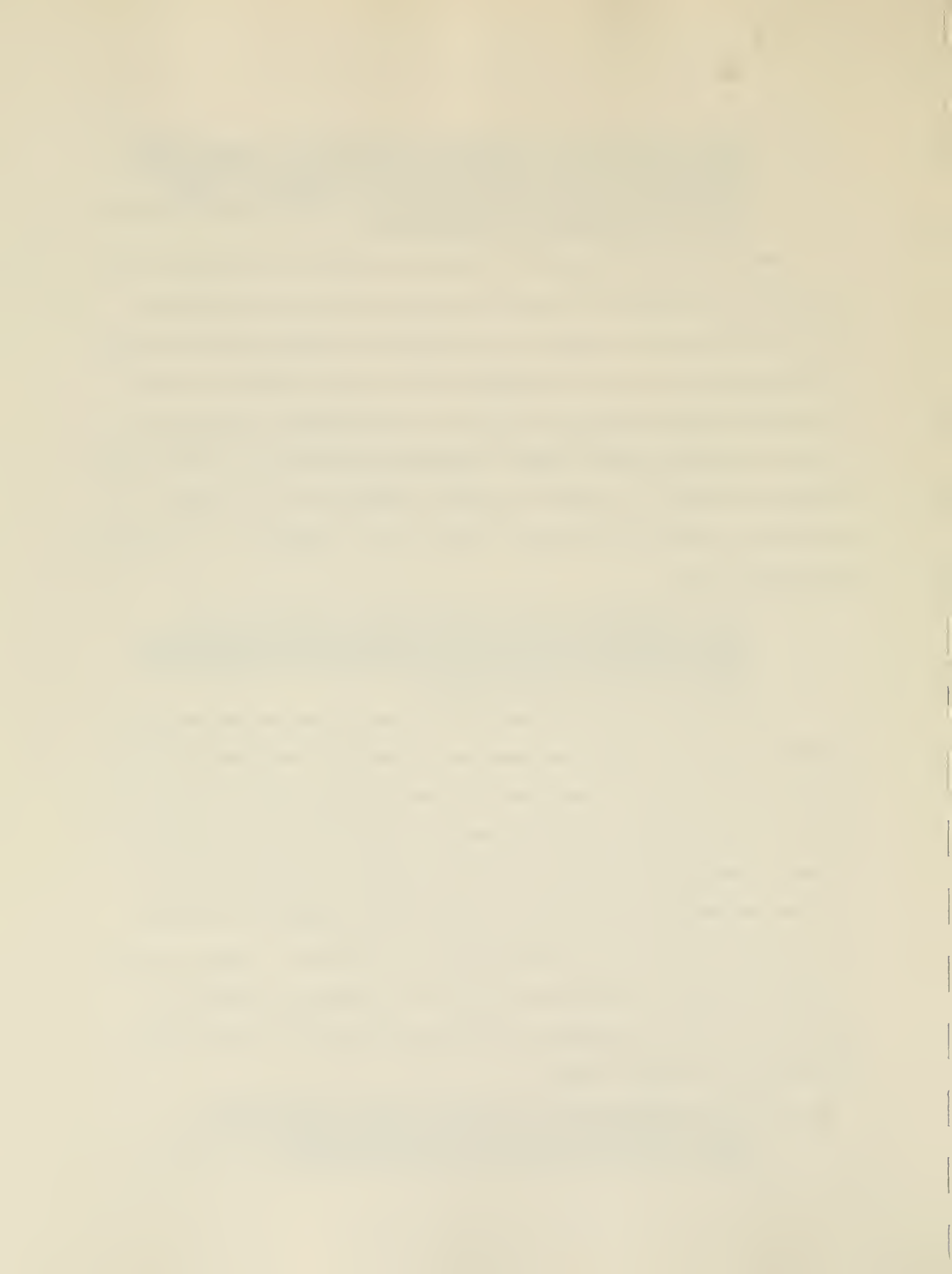
policy directive he/she receives, indicate his/her understanding of the policy and any questions he/she may have. This procedure should provide for a follow-up review and resolution of the questions by the employee's supervisor. These receipts should be filed in each employee's personnel file.

This procedure is important to ensure that staff have reviewed, understood and acknowledged that they understand each policy and that whatever questions they have are answered. Each supervisor should be responsible for reviewing each policy with the employees under his/her supervision and for obtaining the signed receipts for filing in each employee's personnel file. At the time of each employee's annual performance evaluation, a review of the employee's personnel file should be made to determine that all receipts for policies are signed and up-to-date in the file as a condition of a satisfactory performance rating.

91. It is recommended that the Administrator of the Division of Corrections review and approve the policies which are developed and implemented to provide policy direction to and govern the operation of the Pine Hills School.

It is essential that policies which are established to provide policy direction for and to govern the operation of individual institutions, such as the Pine Hills School, be sanctioned and formally established as Division level policy. The Division is the parent agency of the institution and, as such, is ultimately responsible for the over-all development and sound operation of policies and programs, consistent with the statutory responsibilities and administrative policies of the Department of Institutions. Legal assistance in the formulation of correctional policies and procedure is essential to ensure that they are consistent with state and federal law, relevant court decisions and individual rights.

92. It is recommended that a Citizens Advisory Committee be established to advise the Superintendent of the Pine Hills School on matters relating to policy and problems.



This group should be formally established by written policy and procedure. It should be composed of 5-7 carefully selected citizens who are interested in juvenile correctional practices and who are capable of providing responsible advice and support to the Superintendent in the areas of program planning, problem-solving and policy making efforts. This group should meet 3-6 times per year and should maintain appropriate records with secretarial and professional staff support provided by the institution's administration. The qualifications of membership and terms of office should be specified in the written procedure.

93. It is recommended that written policy and procedure be established to govern the collecting and retention of case record information, including, but not limited to, the establishment, content, format privacy, security, preservation and timely sealing or expungement of case records consistent with state and federal law. These policies should be reviewed annually. It is further recommended that the Pine Hills School obtain qualified professional help to provide training to the staff to upgrade case record keeping to meet legal and professional standards.

This is essential not only to assure that the written records will be better in terms of format and content, but also to assist in the upgrading of actual treatment of which the records are a reflection. Accurate and orderly recording of case records can increase the efficiency and effectiveness of service delivery and is essential to over-all facility planning, implementation and evaluation of programs.

94. It is recommended that written policy and procedure be established by the Division of Corrections/Pine Hills School to safeguard case records and information from unauthorized and improper disclosure.

A student's constitutional right to privacy can be violated if case files and/or information are improperly disseminated. This applies to students in residence and also those who have been released. This policy and related procedures should be designed in accordance with the Montana state law and the Privacy Act of 1974 and the U.S. Justice Department, Criminal Justice Information System Regulations.

95. It is also recommended that a policy of numerical sequential assignment numbers for reports be established which clearly designates the day, month, year, and the functional program or service unit and the individual initiating the report.

Implementing a policy of this type will not only help improve record keeping, but also will establish the means to trace missing reports when such instances occur.

96. It is recommended that utilization of the Pine Hills School gymnasium facility be increased, not only by students within the institution but also with local social agencies, business and civic organizations from the Miles City community.

The gymnasium facility is excellent and should be used as often as possible, both for institutional programs and for outside groups to come in. Inviting outside groups to use these facilities would be an excellent local public relations tool. Care must be taken when outside groups come in, however, to adequately protect the civil rights of the Pine Hills students. Also, it would be appropriate to charge outside groups a modest fee to help offset the required maintenance and janitorial services.

VII. PERSONNEL

97. It is recommended that salary levels and employee benefits for all Pine Hills School personnel be competitive with other parts of the juvenile justice system and with comparable occupational groups in both the public and private sector.
98. It is recommended that the Division of Corrections/Pine Hills School obtain the funds and qualified professional assistance necessary to conduct a detailed position classification and salary study for all positions required to operate the Pine Hills School.

It is apparent to the assessment team that the salaries of some Pine Hills School staff are not competitive with comparable occupational groups in the Miles City area. Specifically, this includes educational, social service and cottage life positions. This may also be true for other positions. Competitive salaries are necessary to recruit and retain high caliber staff. For key professional positions it is necessary to develop the competitive ability to recruit on at least a multi-state regional and/or national basis. It is suggested that the recommended position classification and salary study include obtaining and analyzing relevant information from, at a minimum, all states contiguous to the state of Montana. Preferably, this should include all states in the northwest quadrant of the United States.

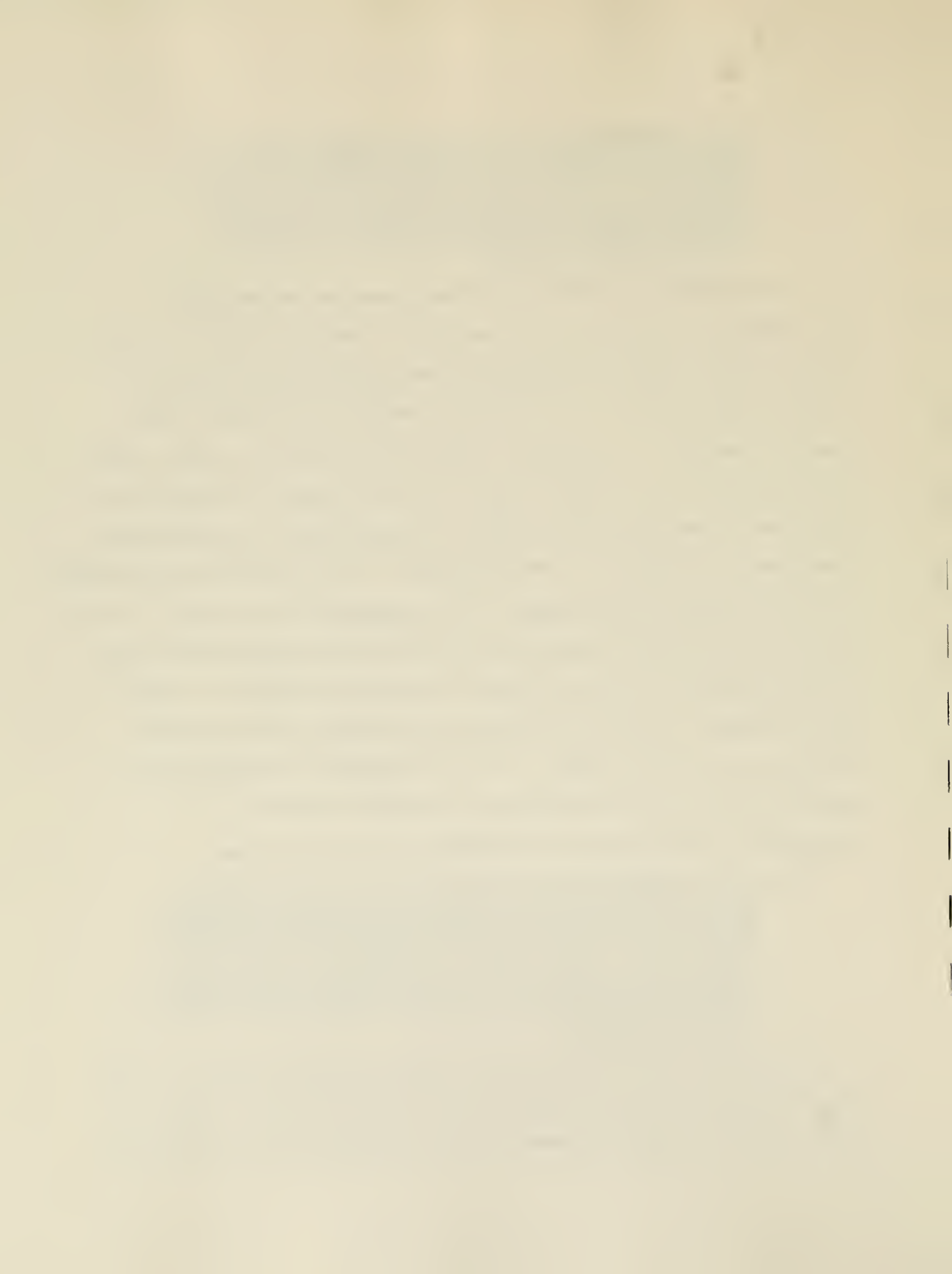
99. It is recommended that a full-time Training Officer position be established at the Pine Hills School, that the person employed to fill this position be a professionally qualified trainer who can design and supervise a written staff development and training program for all employees.
100. It is recommended that written policy and procedure be established to provide that all full-time employees, regardless of status or title, receive 40 hours of orientation prior to job assignment and an additional 40 hours of training during the first year of employment. This policy should include provisions to acknowledge and give credit for any relevant prior training received. This policy should also provide that all full-time employees, regardless of status or title, continue to receive a minimum of 40 hours of relevant training each year after the first year.

101. It is recommended that an Advisory Training Committee be established, composed of the Training Officer and a representative from each operational department of the institution, to assist in the development of the training program, assess each component of the training program, monitor progress and resolve any problems which occur on at least a quarterly basis.

The development of staff is an extremely important responsibility. A well designed and conducted training program is essential to assist in achieving the purposes, goals and objectives of the overall institution and its various programs and services. Orientation should, at a minimum, include a general orientation to the policies, organizational structure, program, rules and regulations of the Pine Hills School and the Division of Corrections. On-going training should provide employees with opportunities for continued skill development, with awareness of new developments in the field and with reinforcement of their knowledge and understanding of the fundamentals of their job. All part-time staff and volunteers who work less than 40 hours per week should receive training appropriate to their particular function and assignment. In cases where volunteers function as full-time staff, they should receive the same training as full-time paid staff. It is also important that adequate reference and library services be made readily available to staff to complement and support the staff development and training program.

102. It is recommended that administrative provisions be made and that the funds necessary for travel be provided to enable the key administrative and supervisory staff of Pine Hills School to periodically visit and review the operation of facilities and services in other states. This should also include attending periodic out-of-state training functions and conferences which have the potential to help them to improve their own skills and job performance.

This can be an important part of the inservice training program for staff who are employed at the supervisory and administrative levels. Trips of this nature should be carefully planned to help keep these key staff familiar with



new developments in the field and to provide opportunities for them to exchange experiences with other juvenile corrections professionals. Such opportunities can make a significant contribution to improving employee morale and job performance.

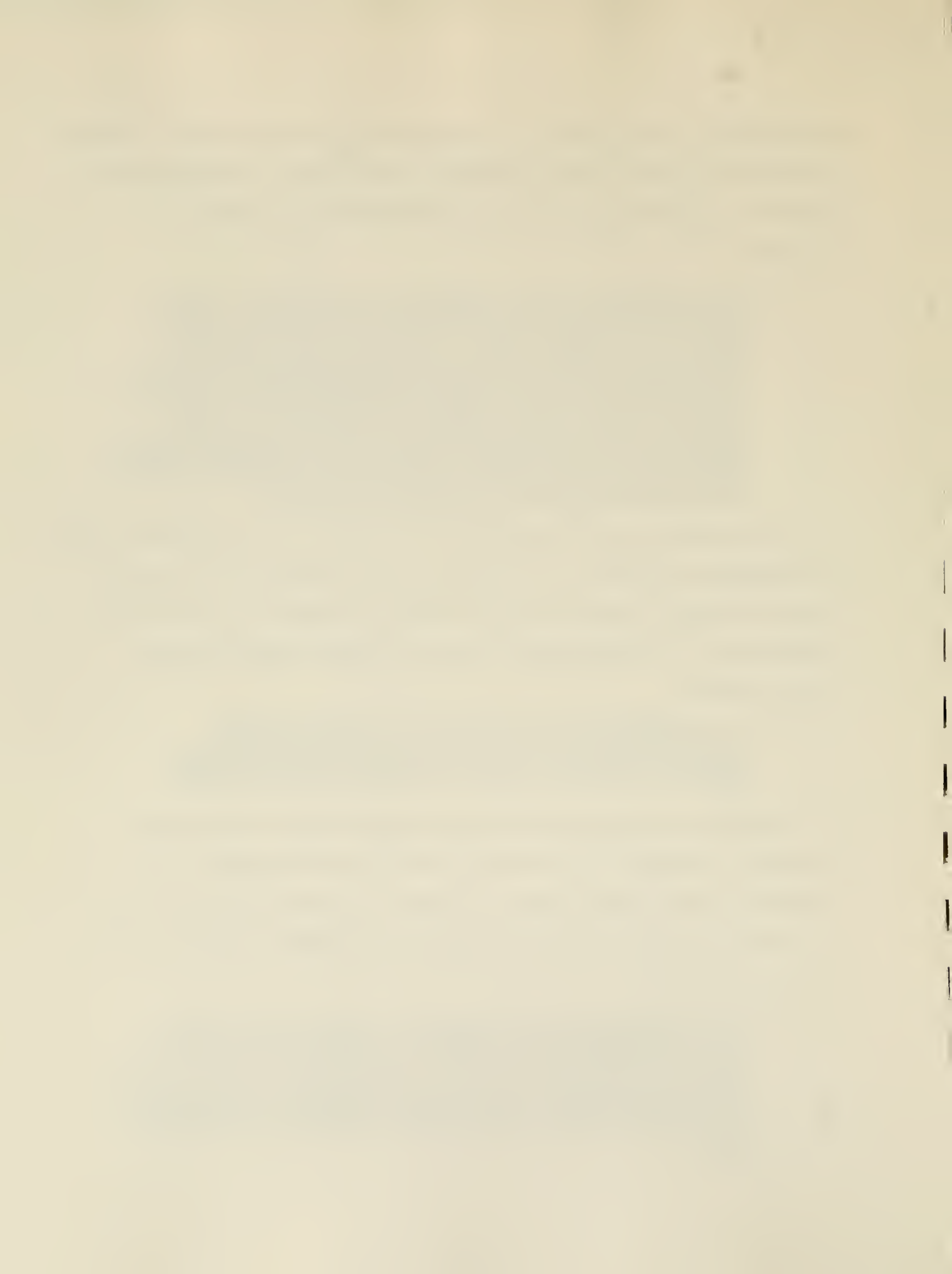
103. It is recommended that a personnel policy manual be prepared and that personal copies be provided to each employee. At a minimum, this manual should include basic information on the Division of Corrections/Pine Hills School staff organization; recruitment procedures; equal employment opportunity provisions, job qualifications, descriptions and responsibilities; basis for determining salaries, benefits, holidays and work hours; personnel records; employee evaluation; pre-and inservice training; promotion; retirement; resignation and termination; employee management relations; physical fitness policy; hostage policy; disciplinary procedures and grievance procedures.

It is essential that this personnel policy manual be in writing and reflect the operational philosophy of the Division of Corrections/Pine Hills School. Every effort should be made to define and make staff aware of career ladder opportunities. This concept should also be reinforced through the staff training program.

104. It is recommended that the Division of Corrections/Pine Hills School conduct a criminal records review on each new employee, within the limits of applicable state and federal law.

Prospective new employees should be evaluated based on education and experience requirements as they relate to the job to be performed. The recommended criminal record check is to assist in determining whether there are criminal acts which would have a specific relationship to job responsibilities and performance.

105. It is recommended that the process of checking out prospective new employees include, in addition to checking the required application references, at least a telephone call to the person's previous supervisor on the last job worked and/or the last job worked over one year. It is further recommended that transcripts be verified for the stated educational degrees of professional staff.



106. It is recommended that each new employee of the Pine Hills School be given a formal letter of appointment by the Superintendent which includes the basic expectations of the employee for job performance and involvement in orientation and training. This letter should also state the period of probation and indicate who will be preparing the evaluation report on his/her job performance. This letter should also state all basic requirements which may yet need to be completed by the employee, such as a medical evaluation, obtaining a driver's license, signing for policy directives received, etc.

Letters of appointment of this type are a very powerful tool in personnel administration. Any employee who has received such a letter and who does not meet the stated expectations does not have the option of saying, "I didn't know," because it is possible to refer to the letter and clearly identify the conditions under which the person was employed. The detailed job description and any other basic written information for new employees can be attached to or enclosed with this formal letter.

VIII. PHYSICAL FACILITIES

107. It is recommended that the capacity of Pine Hills School be reduced to a maximum of 100 beds by March 31, 1979, that each individual cottage living unit not exceed 20 beds, and that the population of the institution not exceed these capacities.
108. It is recommended that the Pine Hills School proceed with the current plans to construct a new building to house the Internal Support Unit of the institution.
109. It is recommended that the Pine Hills School obtain the funds necessary to remove immediately the individual security room areas of the Lewis-Clark building.

This would allow for remodeling of this area for more suitable program use.

110. It is recommended that the Pine Hills School obtain the funds necessary to replace one cottage living unit per year until all the living units that cannot be renovated to meet new facility standards have been replaced. It is further recommended that qualified correctional architectural assistance be obtained to design all new construction.

All new construction should meet or exceed new facility standards as recommended by the Commission on Accreditation for Corrections. With regard to the construction of new living units, it is essential that there be no dormitory living units and that each living unit provide for personalization of space and privacy. All sleeping rooms should include toilet facilities, shower and wash basin (no dry rooms), outside windows for natural lighting, and a minimum of 80 square feet of floor space per resident. In rooms where a youth may be required to spend more than 12 hours, there should be a minimum of 90 square feet. It is also essential that each living unit be designed to provide visiting space and that individual rooms, day rooms and program staff offices are in close proximity for purposes of communication and interaction between students and staff. Individual sleeping rooms in cottages

should be furnished with movable standard sized beds and mattresses, a chest of drawers, a writing desk and chair and acoustics that ensure noise levels that do not interfere with normal human activities. Any rooms used for isolation and/or segregation purposes should be designed so that furnishings and fixtures are safe and secure.

111. It is recommended that partitions be constructed to remodel the dormitory areas in all current living units (every two beds) to provide for personalization of space and privacy for students.
112. It is recommended that the damage to Russell Lodge which allows water leakage into the building be repaired. If currently available funds are not sufficient to make these repairs, every possible effort should be made to obtain the additional funds required on an emergency basis. It is further recommended that unless these repairs are completed by March 31, 1979, the dormitory area of Russell Lodge be declared unusable and closed until the required repairs are completed.
113. It is recommended that qualified correctional architectural assistance be obtained to determine if it is possible to remodel the individual living areas of Russell Lodge to make it more adequate.

The current design is counterproductive; the individual rooms are too small and the layout is inadequate.

114. It is recommended that battery-electric operated emergency lights, which may be used in the event that normal lighting fails in an emergency situation, be installed immediately in all sleeping areas and egress hallways which are not currently so equipped.
115. It is recommended that a washing machine and clothes dryer be installed in each cottage living unit so students can do their own personal laundry and/or the staff members on night duty can do it overnight.

Other laundry, such as sheets, pillowcases and towels, should be done at the central laundry.

116. It is recommended that mandatory health, sanitation and house-keeping standards and procedures be established by written policy. These policies should comply with all federal, state and local health and sanitation codes. This policy should

indicate what the sanitation standards are in terms of cleanliness, what is to be cleaned and how often, who is to be responsible, what cleaning agents are to be used and how they are to be used. This applies especially to all living units and food service areas.

117. It is recommended that written policy and procedure be established to require weekly internal sanitation and safety inspection of all facility areas. It is further recommended that both health and safety inspections be conducted annually and formal reports of such inspections be prepared by officials from the appropriate public health and safety agencies.

It is essential to ensure the health and safety of all students, visitors, and staff. As determined by the assessment team, fire and safety inspections have been conducted in the past, but health and sanitation inspections have not been conducted by the appropriate health authority.

118. It is recommended that immediate steps be taken to secure a comprehensive health inspection of the Pine Hills School by an appropriate outside public health authority.
119. It is recommended that the maintenance work program for the Pine Hills School be prioritized on an immediate and continuous basis so that health and safety items receive the highest priority.
120. It is recommended that the level of repair maintenance staff support for the Pine Hills School be increased to include one full-time position, or the equivalent in contracted services, for each occupied living unit (lodges and the medical services - internal support unit), and one full-time position or the equivalent in contracted services for every two major buildings which are not used as living units (educational, administration and gymnasium buildings, etc.).
121. It is recommended that the necessary funds be requested in the 1982-1983 biennial budget for the Pine Hills School, to provide for independent emergency electrical power in the event of an extended primary power source failure.
122. It is recommended that the Pine Hills School establish and maintain, on a regular basis and in a suitable location, a canteen where students can purchase, on at least a weekly basis, and from an approved list, items not furnished by the facility.

The availability of a reasonable variety of personal items is essential for good morale. It may be necessary, however, to place some restrictions on canteen purchases to minimize any negative effects of differential spending

power among the students.

123. It is recommended that the Pine Hills School obtain the funds necessary to repair the total institutional water and sewer systems to bring them up to standard.

The existing underground water system has been in a continuous state of disrepair and needs to be completely overhauled to avoid continuing problems.

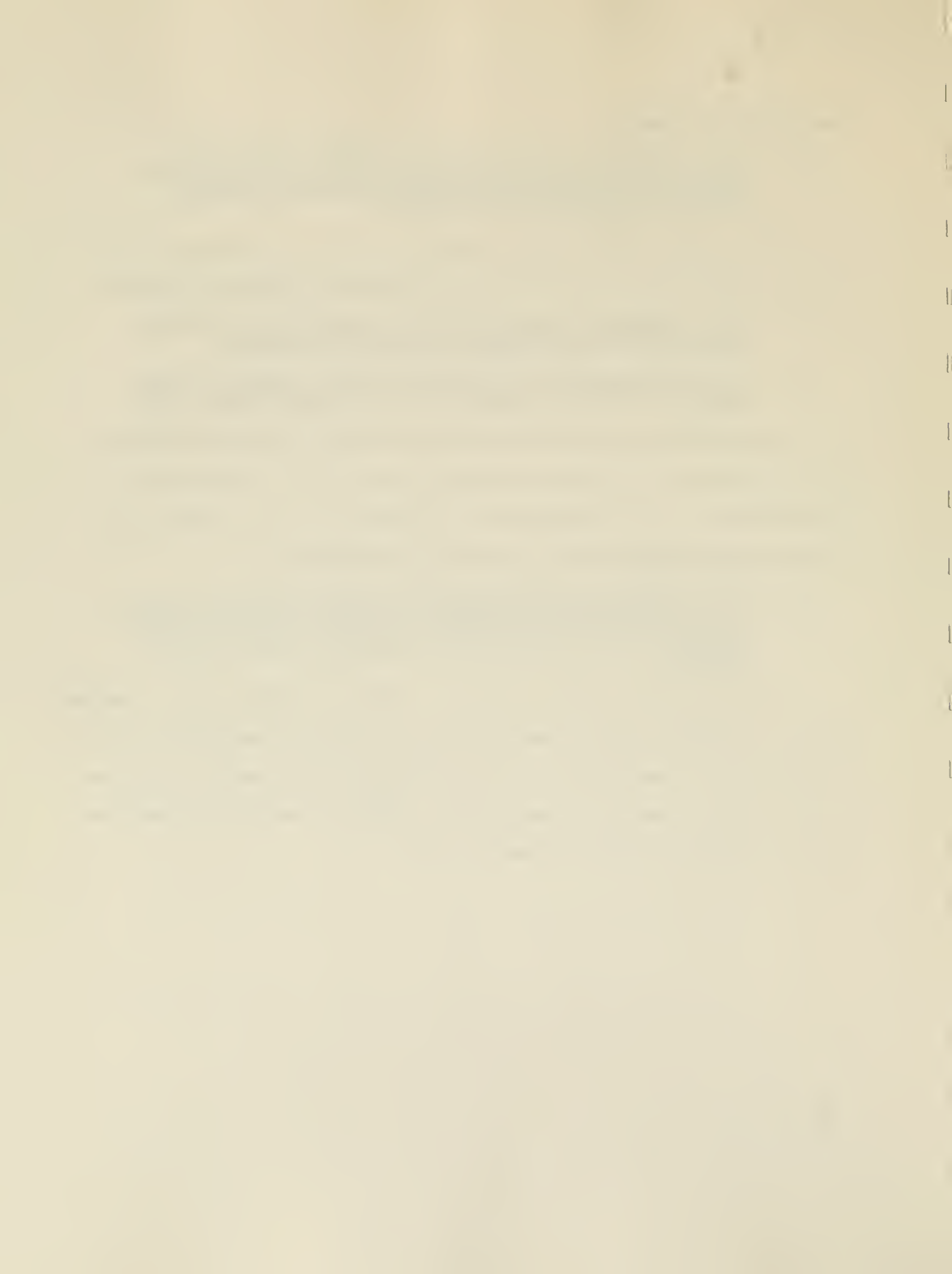
124. It is recommended that the Pine Hills School seek to obtain the funds and expertise necessary to landscape the campus.

125. It is recommended that the Pine Hills School request the funds necessary to completely pave the roads on the main campus area.

The grounds can and should be made more attractive through landscaping than is now the case. Paving the roads will control a dust problem which currently exists. It is suggested that the funds necessary for landscaping and paving be requested within the 1980-1982 biennial budget.

126. It is recommended that the Pine Hills School obtain the services of a qualified interior decorator to assist in designing a color plan that is compatible with the treatment programs of the institution.

The psychological effect of colors in living and program areas is important. Some of the present colors in some of the living units are harsh and agitating. Colors should be used that have a calming effect on the residents. The painting that will be required to improve this situation can easily be accomplished by the institution's repair maintenance staff.



APPENDIX

Commission on Accreditation for Corrections

The Commission is a group of twenty correctional and criminal justice administrators and professionals elected by the membership of the American Correctional Association. Commission Members represent specific areas of concern within the criminal justice system as well as the geographic regions of the United States.

The Commission:

- Prescribes policy and procedure for accreditation of correctional agencies and systems;
- Develops and selects standards for accreditation in cooperation with the American Correctional Association;
- Promotes voluntary participation of correctional administrators and personnel in the accreditation process;
- Awards accreditation to correctional agencies and systems that demonstrate adherence to approved standards;
- Publishes lists of agencies and systems holding pre-accreditation and accreditation status; and
- Continuously reviews and evaluates proposed standards for use in the accreditation process.

The Commission on Accreditation for Corrections will award accreditation to correctional agencies and systems for periods of three or five years, depending upon the extent of compliance of the agencies and systems with the standards approved and adopted by both the Commission and the American Correctional Association.

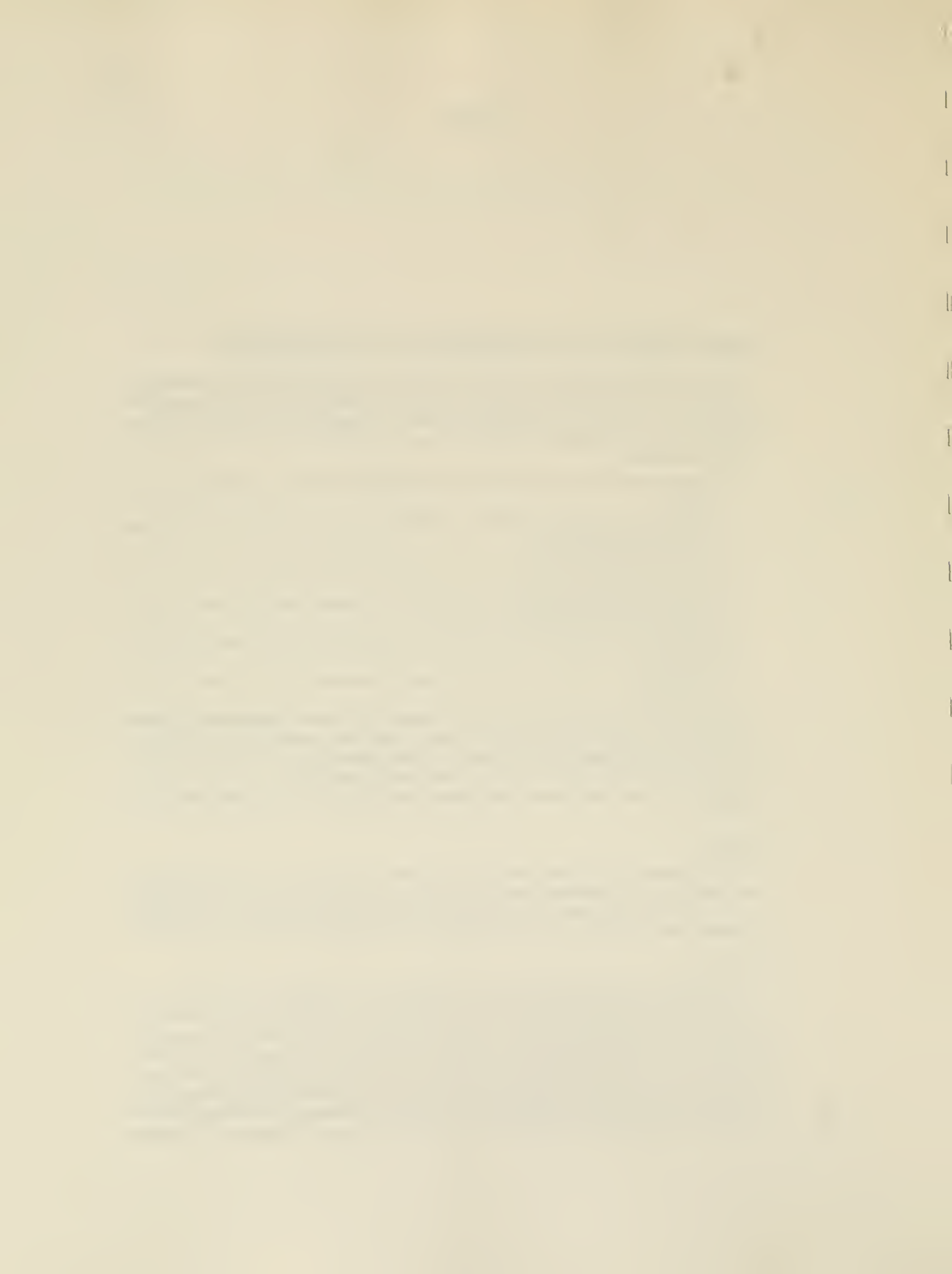
Accordingly, the Commission has prepared and adopted the following *Statement of Principles*:

Preamble

The Commission on Accreditation for Corrections, in order to develop and implement most effectively an accreditation program within and for the field of corrections, at both the juvenile and adult levels, and within the United States of America and such other Countries as may be appropriate and feasible, therefore adopts this *Statement of Principles*.

Principle I

The goals of the correctional field are (1) protection of the public, (2) assistance to the courts regarding offender dispositions, (3) assistance to juvenile and adult offenders to promote law-abiding behavior, (4) provision of just and humane care in the management of offenders, (5) encouragement of and participation in research regarding the causes of delinquency and crime and the effectiveness of correctional methods, (6) provision of efficiency and economy in correctional operations, (7) promotion of and participation in coordinated planning and administration of diversified programs, activities and services of criminal justice agencies, and (8) motivation of improved employee performance



through promotion of education and training opportunities. These goals will be met more effectively and efficiently through the development within major jurisdictions of coordinated systems of services characterized by joint problem identification, joint planning, coordination of operations and joint evaluation of results.

Principle II

The correctional field and the services it provides are, fundamentally, (1) community services, including probation and parole, (2) institutional/residential services, and (3) community residential/transitional services, such as halfway houses and other forms of community programming. These services, when operated effectively and efficiently as interdependent and coordinated components of a total system of services, provide the basis for achievement of the goals of the field.

Principle III

To achieve maximum progress toward the realization of specified goals, it has been and will continue to be necessary for the field of corrections to articulate and adhere to the highest professional standards, which are viewed as required levels of performance in the public interest.

Principle IV

Standards for the correctional field should be expected to undergo continuous review and growth consistent with the experience of new knowledge, skills and methods. Thus, no standard is fixed for all time, nor should any standard constrain efforts toward innovation and the development of more effective methods for achieving the goals of the field.

Principle V

Pursuant to accepted standards, voluntary self-evaluation by correctional agencies within the context of a total system of correctional services is recognized as a sound and productive process for the continuous improvement of both standards and performance.

Principle VI

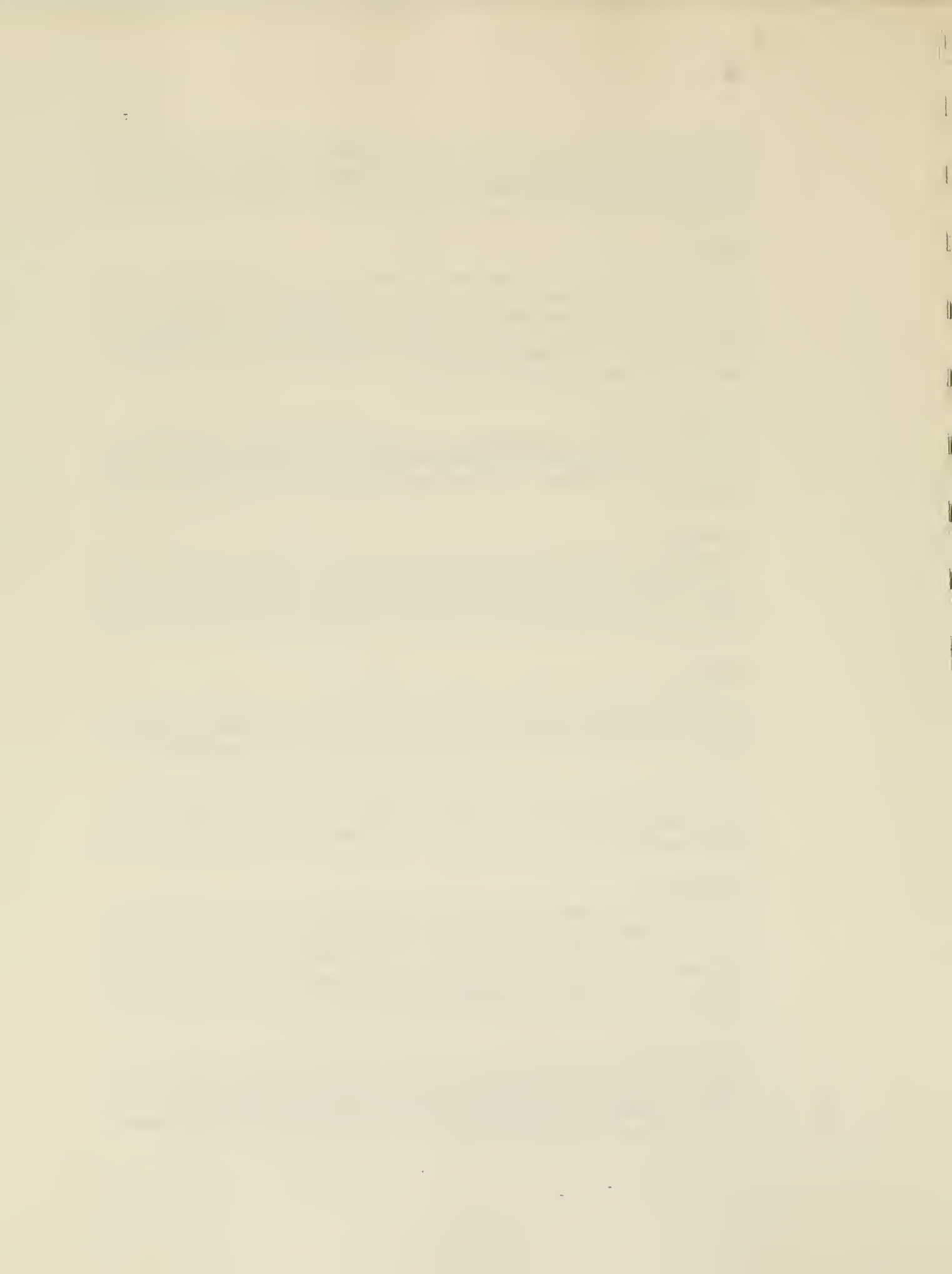
The development and definition of standards, and the application of standards through rigorous self-evaluation are serious social and professional responsibilities of each individual working in the field of corrections.

Principle VII

Accreditation will be awarded to governmental jurisdictions and to individual agencies and services thereof demonstrating adherence to standards approved and accepted by both the American Correctional Association and the Commission on Accreditation for Corrections. The accreditation of individual correctional agencies within a given major jurisdiction is but a step toward the ultimate goal of realizing accreditation of the total system of correctional services within that jurisdiction.

Principle VIII

Among all employees of the correctional field, accreditation will provide recognition of effective leadership and achievement of the highest standards of employee performance. In addition, accreditation can be expected to contribute significantly to the improvement of staff development, teamwork and morale.



Principle IX

Accreditation can be expected to facilitate the identification of strengths and needs at both the correctional agency level, and at the level of the total system of services within major jurisdictions. Short and long range planning will be facilitated at both the agency and total system levels.

Principle X

Among correctional agencies and total correctional systems, accreditation will contribute to the presentation of understandable and persuasive budget requests to both cognizant officials/executives and to the legislative bodies of the respective jurisdictions. The accreditation status indicates that budgeted funds are being used appropriately. Accordingly, it is vital that the courts and all concerned officials, executives, and legislators understand and believe in the integrity of the nationally-recognized standards as applied in the accreditation process.

Principle XI

With the further development of public participation and understanding, the Commission seeks to encourage among all correctional agencies and systems the adoption of new approaches to crime reduction and prevention. The reduction and prevention of crime can be expected to progress with the continuous articulation of standards and the continuous measurement of adherence to standards within the context of coordinated systems of correctional services. Official recognition of correctional effectiveness will follow. In addition, accreditation will provide to interested citizens the opportunity to view their correctional agencies and systems within the framework of nationally-recognized standards.

Principle XII

Adherence to the foregoing principles in the accreditation of correctional services can be expected to result in better utilization of personnel and resources, with maximum benefits to the criminal offender, to the correctional field, and to the public.

